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ABSTRACT

The product of some 10 years of work directed toward federal legislation addressing and defining youth camp safety, the Youth Camp Safety Act (S. 258), as presented in these hearings, calls for the federal government to assume a role in the development of state health and safety standards for children attending youth camps in any state in the nation. Arguments presented in favor of this legislation contend that most (80%) of the states do not presently have safety regulations applicable to youth camps, and it is maintained some camps operate under "appalling" conditions. Arguments presented against this bill contend that youth camp injuries and deaths are not statistically significant and that implementation of the Act would produce administrative waste and ineptly derived standards which would then be enforced by bureaucrats, rather than trained camp personnel. Statements are presented by witnesses representing the following groups: Girl Scouts, United States of America; American Camping Association; Boy Scouts of America; Christian Camping International; Word of Life International; Camp Fire Girls, Inc.; Camping Association for Mutual Progress; Wilds Christian Camp and Conference Center; Department of Health, Education, and Welfare; Center for Disease Control, Public Health Service; Environmental Health Services Division, Public Health Service; and two U.S. Senators from Connecticut. Additional information is presented in the way of nine articles or publications and one communication. (JC)

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ED169629

CHILDREN AND YOUTH CAMP SAFETY ACT, 1978

FEB 1978

HEARING

BEFORE THE

SUBCOMMITTEE ON CHILD AND HUMAN DEVELOPMENT

OF THE

COMMITTEE ON HUMAN RESOURCES UNITED STATES SENATE

NINETY-FIFTH CONGRESS

SECOND SESSION

ON

S. 258

TO PROVIDE FOR THE DEVELOPMENT AND IMPLEMENTATION OF PROGRAMS FOR CHILDREN AND YOUTH CAMP SAFETY

MARCH 21, 1978

U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

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CHILDREN AND YOUTH CAMP SAFETY ACT, 1978

TUESDAY, MARCH 21, 1978

U.S. SENATE,
SUBCOMMITTEE ON CHILD AND HUMAN DEVELOPMENT
OF THE COMMITTEE ON HUMAN RESOURCES,
Washington, D.C.

The subcommittee met, pursuant to notice, at 9:24 a.m., room 4232, Dirksen Senate Office Building, Senator Alan Cranston (chairman of the subcommittee) presiding.

Present: Senator Cranston.

Senator CRANSTON. The hearing will come to order.

Good morning Senator Ribicoff. Good morning to each of you.

With the assumption that you may have somewhere else to be immediately, why don't you go ahead?

Senator RIBICOFF. I do have to chair hearings on the Department of Education as soon as I leave here.

Senator CRANSTON. I have an opening statement, but I will make it after you give your testimony.

Senator RIBICOFF. You are very courteous and thoughtful. Thank you, Mr. Chairman.

I would ask unanimous consent that my entire statement go in the record as if read.

Senator CRANSTON. Of course.

STATEMENT OF HON. ABRAHAM RIBICOFF, A U.S. SENATOR FROM THE STATE OF CONNECTICUT

Senator RIBICOFF. I want to express my appreciation to you for holding hearings on the Children and Youth Camp Safety Act. I am hopeful that we can do something this year.

It has been 12 years since I first introduced legislation establishing a Federal role in encouraging and aiding the States in establishing health and safety standards.

This got started as a result of the impetus of a constituent of mine, Mr. Mitch Kurman, who had a tragic death happen to a child. He stayed with this all through these years and he has aroused the country and aroused me to my continued interest. It is a sad commentary, Mr. Chairman, that we here—you and I are part of it—we enact legislation to protect plants, sea life, eagles, bird species, wild horses, burros, marine mammals, but nevertheless we fail to do anything to protect the tens of millions of boys and girls who go to camp every summer.

The conditions at many summer and youth camps are appalling.

All too frequently there is dangerous equipment, unsafe or improperly operated vehicles, poor sanitation facilities, inadequate medical provisions, untrained personnel, and many others.

Consequently, children have been killed or permanently injured. Yet only 10 States have some type of agency responsible for monitoring camp conditions, and I am glad to say that at least your State and mine are 2 of the 10 States that do something to try to insure the safety of children going to camp in our respective States.

It would seem to me it is both a duty and function of each State to protect the health and safeguards of the millions of children attending camp.

The legislation I introduced in January 1977 is identical to the measure favorably reported out of the former Youth Children Subcommittee in the 94th Congress and my bill clearly recognizes that the States assume responsibility for the development and enforcement of effective youth camp safety standards.

The Department of HEW will establish minimum standards for the operation of safe and sanitary facilities. Such standards are to be developed in cooperation with advisory counsel and youth camp safety and must be approved by both Houses of Congress.

States, it seems to me, have three choices: To enforce their own regulations which must be at least equal with the Federal guidelines, to accept and enforce the Federal standards, or to grant HEW authority to enforce the Federal requirements.

In my State of Connecticut, the camp safety law has worked rather well for the past 9 years. We have a Camp Safety Advisory Council which reviews the camp inspection program and advises on policy.

Even so, the State of Connecticut Environmental Health Services Division of the State Health Department, which is responsible for carrrying out the camp safety requirements, is anxious for a Federal statute.

It believes a Federal law will lead to better interstate cooperation.

I would like to point out that many thousands of children in Connecticut do go to camp outside of the State of Connecticut, so they do not have this protection.

Mr. Chairman, over 6 years ago the Senate passed legislation similar to my current bill. Unfortunately, it was seriously weakened by the House. It seems that we can wait no longer and, had substantive youth camp safety legislation been enacted by this time, I believe that many of the estimated 100 deaths and more than a quarter of a million serious accidents which occur at camps each summer could have been avoided.

I do hope, Mr. Chairman, that you and your committee can see a way to report out a favorable youth camp safety legislation this year as fast as possible, so that young campers can have the protection they need and deserve.

In addition to my statement, Mr. Chairman, I ask unanimous consent that a statement of my colleague, Senator Weicker, be inserted in the record at this time. A conflict in schedule makes it impossible for him to appear.

Senator CRANSTON. Of course.

[The prepared statements of Senators Ribicoff and Weicker follow:]

YOUTH CAMP SAFETY ACT, S. 258
Statement of Hon. ABE RIBICOFF of Connecticut
Senate Child and Human Development Subcommittee
Tuesday, March 21, 1978

Mr. Chairman, I first want to express my appreciation for your decision to hold these hearings on my bill -- S. 258, the Children and Youth Camp Safety Act -- and on the general issue of health and safety conditions in the Nation's youth camps. I am hopeful this session will result in positive action on the very critical issue of youth camp safety.

I regret, however, that it is necessary for me to appear before you this morning. It has been almost twelve years since I first introduced legislation establishing a Federal role in encouraging and aiding States to develop health and safety standards for children attending youth camps. For well over a decade I have worked with such able legislators as our former colleague Vice President Walter Mondale and the late Senator Hubert Humphrey to provide some meaningful protection for the eight to ten million American youngsters who attend an estimated ten thousand summer camps every year. As yet, such protection has not been forthcoming at the Federal level and is virtually nonexistant at the State level.

It is a sad and curious commentary that the Congress enacts legislation to protect plants, sealife, eagles and other bird species, wild horses and burros, and marine mammals. Nevertheless, we fail to provide substantive safeguards for the millions of boys and girls -- our children and grandchildren -- who attend summer camps.

Camping can be a rich and rewarding experience. A child can learn many new skills and crafts as well as something about himself and his ability to adopt to new surroundings and new challenges.

The young camper will have experiences which will help to mold and develop him. In some instances summer camp is the only respite a child may have from crowded urban tenements. A week or month at camp is an important ingredient in developing a child's self-confidence; it contributes toward his maturity.

However, as Professor Betty van der Smissen of Pennsylvania State University has so aptly observed, the camping contribution "can be minimized if the environment in which the camp experience takes place is not safe. To be in a safe environment is a right, not a privilege of the participants."

The fact is, Mr. Chairman, that conditions at many summer and youth camps are simply appalling. All too frequently there is dangerous equipment, unsafe or improperly operated vehicles, poor sanitation facilities, inadequate medical provisions, untrained personnel, improper supervision, and hazardous activities. Consequently children have been killed, permanently injured, sexually abused, or suffer accidents requiring some degree of medical attention. Many of us have seen disturbing and dramatic news accounts of some of these incidents. Nevertheless, only ten States have some type of agency responsible for monitoring camp conditions and operations. I am glad to say, at least, that Connecticut, California, and Michigan are among those ten States.

At times I hear that the Federal Government has no proper role in the area of child and youth camp safety. Some say the issue is better left to the individual States. I would be among the first to agree that it is both the duty and function of each State to protect, safeguard and monitor the health, safety, and welfare of the Nation's youngsters attending youth camps. However, only 12 States have some

meaningful health and safety regulations and only 28 States have some regulations dealing with youth camp safety.

Furthermore, 45 States have no regulations which apply to camping personnel; 17 have no standards relating to program safety; 24 States have no requirements for personal health, medical aid, and medical services; 45 States have no regulations covering out-of-camp trips or "primitive outpost" camps; and 35 States do not regulate day camps.

As with Connecticut and a few other States, good safety laws are possible when States want to protect their young campers. Regretably, all States are not so inclined.

Consider, if you will, last summer's abduction of 15-year-old Charlotte Grosse who was camping with a group of Girl Scouts in a remote Florida state park. Shortly after this incident occurred my office inquired into the Florida statutes governing camping. The State of Florida has no comprehensive youth camp safety laws. Regulations at that time simply dealt with health issues such as camp cleanliness and food preparation. The Florida State Recreation and Park Division advised that the only requirement for young campers is that they be accompanied by an adult.

Some 100,000 children attended 300 camps in Maryland last summer. Yet the State of Maryland has no safety or health standards for its camps, even covering the most hazardous sports and activities. Despite the long and persistent efforts of Maryland Delegate Lucille Maurer, a camp safety measure has yet to be enacted in Annapolis.

Neither Federal nor State regulations can prevent accidents. It is not possible to legislate accidents away . We can take affirmative steps, however, to eliminate the causes of many accidents by encouraging and assisting States to develop proper and effective

standards for youth camps.

The legislation I introduced in January 1977 is identical to the measure favorably reported out of the former Children and Youth Subcommittee -- this panel's predecessor -- in the 94th Congress. My bill clearly recognizes that the States "assume responsibility for the development and enforcement of effective youth camp safety standards."

Under this measure the Department of Health, Education and Welfare will establish minimum standards for the operation of safe and sanitary camp facilities. Such standards are to be developed in cooperation with an Advisory Council on Children and Youth Camp Safety and must be approved by both Houses of Congress. The regulations will go into effect 21 months after enactment. States have three choices -- to enforce their own regulations which must be at least equal with the Federal guidelines, to accept and enforce the Federal standards, or to grant HEW authority to enforce the Federal requirements. Because the State should have the primary responsibility, financial incentives -- up to 80 percent matching funds -- will be available to States choosing to enforce the program themselves.

Is such a law redundant in those few, isolated instances where responsible State regulations exist? I think not. In my State of Connecticut, the camp safety law has worked rather well for the past nine years. We have a Camp Safety Advisory Council which reviews the camp inspection program and advises on policy. The State regulations are being constantly improved and upgraded. Even so, the Environmental Health Services Division of the State Health Department, which is responsible for carrying out the camp safety requirements, is anxious for a Federal statute. It believes a Federal law will lead

to better interstate cooperation. It recognizes the need for the Federal Government to give guidance and direction, particularly in those areas where there are no State regulations or State enforcement.

Respectable and well-known groups such as the American Camping Association, the Association of Private Camps, scouting organizations, and a number of religious groups have endorsed a Federal camp safety law. They, too, recognize the need for proper camp safety standards. Some have had to develop and enforce their own standards because of inadequate or nonexistant State and Federal regulations. They know that parents must have some effective benchmark against which to judge the conditions of the camps to which they send their children.

Mr. Chairman, over six years ago the Senate passed legislation similar to my current bill. Unfortunately, it was seriously weakened by the House. The only outcome of youth camp safety legislation to date has been an HEW study which a recent House Education and Labor Committee report has characterized as "unreliable and ineffective." This HEW study -- which effectively postponed substantive action on the issue for several years -- did reveal that State youth camp safety laws mostly were nonexistant or grossly inadequate.

We can wait no longer! Had substantive youth camp safety legislation been enacted by this time I believe that many of the estimated one hundred deaths and more than a quarter of a million serious accidents which occur at camps each summer could have been avoided. I appreciate your consideration of this issue. I urge that prompt and favorable action be taken on pending camp safety legislation so that young campers can have the protection they need and deserve.

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STATEMENT OF SENATOR LOWELL WEICKER, JR.
IN SUPPORT OF S. 258, THE YOUTH CAMP SAFETY ACT
BEFORE THE SUBCOMMITTEE ON CHILD AND HUMAN DEVELOPMENT
TUESDAY, MARCH 21, 1978

Mr. Chairman, I regret that I am unable to testify in person at this important hearing, but I offer my full support for favorable action on S. 258, the "Children and Youth Camp Safety Act."

I was proud to join my colleague from Connecticut once again this year in cosponsorship of a piece of legislation years overdue.

The remarkable truth is that the majority of states makes no effort to safeguard our millions of camping youngsters by providing that some minimum safety standards be met. The results of this inaction recur each summer: drownings, accidental shootings, blindings and cripplings. To an alarming extent, these are the result of poorly trained camp staffs, many of whom are juveniles themselves, or delapidated facilities that are somehow thought adequate for camping youngsters under the guise of "roughing it."

I would hope, Mr. Chairman, that this session of Congress will see the passage -- by both House of Congress - of this legislation, which has passed each House before. Early passage this year will mean one less summer of disability or death because of preventable camping accidents.

I applaud the leadership of the Subcommittee on Child and Human Development in holding these hearings, and urge expeditious action on this critical measure.

Senator RIBICOFF. Thank you very much, Mr. Chairman.

Senator CRANSTON. Thank you very much, Abe.

Thank you for your helpful testimony and being here.

The Subcommittee on Child and Human Development is considering today the issue of youth camp safety legislation. This is a topic which, as many of you know, has been considered by the Congress for over a decade. The only Federal legislation enacted in this area consisted of a measure passed in 1972 directing the Department of HEW to conduct a study into the adequacy of State laws and activities involving youth camp health and safety and the extent of preventable accidents and illnesses occurring in these camps, and to make an evaluation of the need for Federal legislation.

The HEW report, issued in April of 1974, concluded generally that the incidence of deaths and accidents in the Nation's youth camps was low, based upon normal mortality and accidents rates for the age group in the population at large. The study found that there was an absence of sufficient State laws and regulations in this area and deficient enforcement of existing laws but recommended against enactment of Federal legislation to regulate youth camps. However, the report's conclusions as to the incidence of injuries and deaths and its methodology for gathering data, has been subject to much criticism. Hearings before the Subcommittee on Children and Youth in July of 1974, chaired by then Senator Mondale, probed extensively the reliability of the HEW report.

The truth is that today we still don't have any hard, reliable data on the dimensions of the injuries and deaths in youth camps. There is neither a national reporting system nor a consensus on how serious a problem exists. We do know that each year many children are injured in summer camps and that some die of these injuries. These injuries and deaths are, of course, tragic.

We don't know what percentage of the injuries or deaths were preventable. We do know that only a handful of States have comprehensive laws protecting children in camps. We need to know whether the incidence of injury or death is lower in those States than in States without such laws.

I am, as I think every person in this room is, concerned that children attending summer camps have a safe and healthy environment and that the number of child injuries and deaths be significantly reduced.

At the same time, I am very concerned about the appropriate role for the Federal Government. Certainly, the Federal Government must do all possible to bring about appropriate and effective action in this area. Traditionally, States have had the primary responsibility for safeguarding the safety and public health of their citizens. I believe that each new proposal to substitute Federal control for State and local authority must be carefully scrutinized by the Congress since there is legitimate concern that the Federal Government already regulates too much of our lives. Direct Federal intervention in an area of State responsibility is justifiable, I believe, only where governmental and voluntary action at the State and local level has clearly failed to do the job. If the States are failing to do what can be done

to meet a real problem, then there may be an appropriate role for the Federal Government to play in prodding and stimulating them into action.

In April, representatives of the Department of Health, Education, and Welfare, testified before the House Subcommittee on Compensation, Health, and Safety of the Committee on Education and Labor that during 1977 the Department intended to undertake a comprehensive review of the appropriate Federal role in youth camp safety to be completed by January 1978. I look forward to hearing the administration's views in the area of youth camp health and safety and on the Federal Government's proper responsibility.

I understand that the administration will soon be submitting a legislative proposal on youth camp safety. We will be studying it very carefully as soon as it is submitted.

I am eager to hear this morning's witnesses and hope that they will be able to provide some answers to the questions which continue to be raised in this area.

As soon as the administration's bill is available, we will be sending a copy to each witness for written comments on it.

As is customary, in order for the administration's bill to be considered by Congress, I will be introducing the bill when it is ready, but this action by me will not indicate my views on the measure, whether supportive, nonsupportive, or a mix of both.

I plainly have no views on it now since I do not know what it will contain and I will not necessarily have views at the time I introduce the bill because we will do it the moment we get it.

So my views and the views of the committee will develop thereafter.

[The text of S. 258 follows:]

95TH CONGRESS
1ST SESSION

S. 258

IN THE SENATE OF THE UNITED STATES

JANUARY 14, 1977

Mr. RIBICOFF (for himself, Mr. HUMPHREY, Mr. MAGNUSON, Mr. PELL, and Mr. WEICKER) introduced the following bill; which was read twice and referred to the Committee on Labor and Public Welfare

A BILL

To provide for the development and implementation of programs for children and youth camp safety.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That this Act may be cited as the "Children and Youth Camp Safety Act".

STATEMENT OF PURPOSE

SEC. 2. (a) It is the purpose of this Act to protect and safeguard the health and well-being of the children and youth of the Nation attending camps, to provide Federal assistance to the States in developing programs for implementing safety standards for youth camps, to provide for the Federal imple-

mentation of safety standards for youth camps in States which do not implement such standards and for Federal recreational camps, thereby providing assurance that youth camps and Federal recreational camps meet minimum safety standards.

(b) In order to protect and safeguard adequately the health and well-being of the children and youth of the Nation attending camps, it is the purpose of this Act that youth camp safety standards be applicable to intrastate as well as interstate youth camp operators.

CONGRESSIONAL INTENT REGARDING STATE INVOLVEMENT

SEC. 3. It is the intent of Congress that the State assume responsibility for the development and enforcement of effective youth camp safety standards. The Secretary shall provide, in addition to financial and technical assistance, consultative services necessary to assist in the development and implementation of State youth camp safety standards.

DEFINITIONS

SEC. 4. For purposes of this Act—

(1) The term "youth camp" means any residential camp, day camp, troop camp, travel camp, trip camp, primitive or outpost camp, or Federal recreational youth camp located on private or public land, which—

(A) is conducted as a youth camp for 10 or more campers under 18 years of age;

(B) may include activities promoted or advertised as something other than a youth camp, but offers youth camp activities; and

(C) may include any site or facility primarily designed for other purposes, such as, but not limited to, any school, playground, resort, or wilderness area.

(2) The term "youth camp activities" includes, but is not limited to, such waterfront activities as swimming, diving, boating, lifesaving, canoeing, sailing, and skindiving; such other activities as archery, rifle range activities, horseback riding, hiking, and mountain climbing, and other sports and athletics; and campcraft and nature study activities, under the auspices of a youth camp operator. The term does not include—

(A) the activities of a family and its guests carried out as a purely social activity;

(B) regularly scheduled meetings of voluntary organizations such as the Girl Scouts or Boy Scouts that do not involve camping experience;

(C) regularly scheduled athletic events of the little league and similar organizations that do not involve camping experiences;

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(D) bona fide extracurricular activities conducted under the auspices of the schools;

(E) learning experiences in the arts and drama or conferences or forums; and

(F) activities carried on in private homes.

(3) The term "permanent campsite" means a campground containing within the premises thereof temporary or permanent structures and installed facilities which are continuously or periodically used for camping purposes for a portion of a day by a youth camp operator.

(4) The term "residential camp" means a youth camp operating on a permanent campsite for four or more consecutive 24-hour days.

(5) The term "day camp" means a youth camp operated on a permanent campsite for all or part of the day but less than 24 hours a day and which is conducted on a seasonal basis for at least 5 days during a 2-week period, but does not include—

(A) swimming facilities operated by a public agency or by a private organization on a membership basis;

(B) a day care center, except where that credit operates a day camp; or

(C) playgrounds and other recreational facilities provided for neighborhood use by local public agencies.

(6) The term "troop camp" means a youth camp which

provides youth camp activities conducted for not less than 24 hours a day for organized groups of campers sponsored by a voluntary organization serving children and youth.

(7) The term "travel camp" means a youth camp which provides youth camp activities conducted for not less than 24 hours a day and which uses motorized transportation to move campers as a group from one site to another over a period of 2 or more days.

(8) The term "trip camp" means a youth camp which provides youth camp activities conducted for not less than 24 hours a day which moves campers under their own power or by a transportation mode permitting individual guidance of a vehicle or animal from one site to another.

(9) The term "primitive or outpost camp" means a portion of the permanent camp premises or other site under the control of the youth camp operator at which the basic needs for camp operation, such as places of abode, water supply systems, and permanent toilet and cooking facilities, are not usually provided.

(10) The term "Federal recreational camp" means a camp or campground which is operated by, or under contract with, a Federal agency to provide opportunities for recreational camping to campers.

(11) The term "camper" means any child under 18

years of age, who is attending a youth camp or engaged in youth camp activities.

(12) The term "youth camp operator" means any private or public agency, organization, or person, and any individual, who operates, owns, or controls, a youth camp, whether such camp is operated for profit or not for profit.

(13) The term "youth camp staff" means any person or persons employed by a youth camp operator, whether for compensation or not, to supervise, direct, or control youth camp activities.

(14) The term "youth camp director" means the individual on the premises of any youth camp who has the primary responsibility for the administration of program operations and supportive services for such youth camp and for the supervision of the youth camp staff of such camp.

(15) the term "youth camp safety standards" means criteria issued by the Secretary designed to provide to each camper safe and healthful conditions, facilities, and equipment which are free from hazards that are causing, or are likely to cause death, serious illness, or serious physical harm, including adequate supervision to prevent injury or accident and safety instruction by properly qualified personnel, wherever or however such camp activities are conducted and with due consideration to the type of camp involved and to conditions existing in nature. The criteria

shall be directed toward areas including—but not limited to—personnel qualifications for director and staff; ratio of staff to campers; sanitation and public health; personal health, first aid and medical services; food handling, mass feeding and cleanliness; water supply and waste disposal; water safety, including use of lakes and rivers, swimming and boating equipment and practices; firearm safety; vehicle condition and operation; building and site design; equipment; and condition and density of use.

(16) The term "Secretary" means the Secretary of Health, Education, and Welfare.

(17) The term "State" includes each of the several States, the District of Columbia, Puerto Rico, American Samoa, Guam, the Virgin Islands, and the Trust Territories of the Pacific.

(18) The term "serious violation" means any violation in a youth camp if there is substantial probability that death or serious physical harm could result, unless the operator did not, and could not, with the exercise of reasonable diligence know of the presence of the violation.

GENERAL DUTY

SEC. 5. Each youth camp operator shall provide to each camper—

(1) safe and healthful conditions, giving due consideration to conditions existing in nature, facilities, and

equipment which are free from recognized hazards which cause, or are likely to cause, death, serious illness, or serious physical harm, and

(2) adequate supervision to prevent injury or accident and safety instruction by properly qualified personnel, in youth camp activities at all times, wherever or however such youth camp activities are conducted.

PROMULGATION OF YOUTH CAMP SAFETY STANDARDS

SEC. 6. (a) The Secretary shall develop, and, by rule, promulgate, modify, or revoke Federal youth camp safety standards. In developing and amending such standards, the Secretary shall—

(1) consult with the Advisory Council on Youth Camp Safety established under section 15, with State officials, and with representatives of appropriate public and private organizations;

(2) consider existing State regulations and standards and standards developed by private organizations which are applicable to youth camp safety;

(3) include provisions for the special consideration of handicapped campers;

(4) make such suitable distinctions in such standards as are necessary and appropriate in order to recognize the differences in conditions and operations among residential camps, day camps, troop camps, travel camps,

trip camps, primitive or outpost camps, or Federal recreational camps; and

(5) provide appropriate informal procedures for oral and written presentations by interested persons.

(b) The Secretary shall initially promulgate standards required by this section within 9 months after the effective date of this Act. Regulations shall take effect 2 years after the date of promulgation of the standards under this section.

STATE JURISDICTION AND STATE PLANS

SEC. 7. (a) During the 2-year period after the initial promulgation of Federal standards and annually thereafter, any State which desires to assume responsibility for development and enforcement of youth camp safety standards applicable to youth camps (other than travel camps involving interstate travel and Federal recreational youth camps operated by a Federal agent) shall submit a State plan for the development of such standards and their enforcement.

(b) The Secretary shall approve, without regard to the standards established under section 6, a plan submitted by a State under subsection (a), or any modification thereof, if such plan—

(1) provides, after consultation with youth camp operators and other interested parties in that State, that standards and enforcement procedures established by that State will be sufficient to insure that youth camp

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operators in that State fulfill the same or substantially similar general duties described in section 5 of this Act, and

(2) provides for procedures, as described in section 13 (a) of this Act, to counteract imminent dangers upon the petition of an appropriate State official, who shall be designated in the plan, and

(3) provides such fiscal control and fund accounting procedures as may be necessary to assure proper disbursement of and accounting of funds received under this Act.

Regulations promulgated by the Secretary to carry out clause (1) of this subsection shall specify only the general subject matter of the standards to be so established and the kinds of enforcement procedures to be so established. Such regulations shall be published in the Federal Register at least 45 days prior to their effective date.

(c) The Secretary shall not finally disapprove any State plan, or any modification thereof, without affording the State agency reasonable notice and an opportunity for a hearing.

(d) The Secretary shall have no administrative or enforcement authority in any State which has in effect a plan approved under this section except that he shall review annually each State plan which he has approved, and the enforcement thereof, and shall certify that each such plan is

administered so as to comply with the provisions of such plan and report such certification to the Congress in the annual report required under section 16(b). Whenever the Secretary finds, after affording due notice and opportunity for a hearing, that in the administration of the State plan there is a failure to comply substantially with any provision of the State plan, he shall (1) notify the State agency of his withdrawal of approval of such plan and upon receipt to such notice such plan shall cease to be in effect, but the State may retain jurisdiction in any case commenced before the withdrawal of the plan in order to enforce standards under the plan whenever the issues involved do not relate to the reasons for the withdrawal of the plan; and (2) shall notify such State agency that no further payments will be made to the State under this Act (or in his discretion, that further payments to the State will be limited to programs or portions of the State plan not affected by such failure), until he is satisfied that there will no longer be any failure to comply. Until he is so satisfied, no further payments may be made to such State under this Act (or payment shall be limited to programs or portions of the State plan not affected by such failure).

(e) The State may obtain a review of a decision of the Secretary withdrawing approval of or rejecting its plan by the United States court of appeals for the circuit in which

the State is located by filing in such court within 30 days following receipt of notice of such decision a petition to modify or set aside in whole or in part the action of the Secretary. A copy of such petition shall forthwith be served upon the Secretary and thereupon the Secretary shall certify and file in the court the record upon which the decision complained of was issued as provided in section 2112 of title 28, United States Code. Unless the court finds that the Secretary's decision in rejecting a proposal State plan or withdrawing his approval of such plan is not supported by substantial evidence the court shall affirm the Secretary's decision. The judgment of the court shall be subject to review by the Supreme Court of the United States upon certiorari or certification as provided in section 1254 of title 28, United States Code.

(f) (1) The Secretary shall provide technical assistance and consultative services necessary to assist in the development and implementation of the plan.

(2) The Secretary is authorized to furnish personnel from the Department of Health, Education, and Welfare who have the necessary expertise to assist in developing State plans, and in training State inspectors and other personnel associated with youth camps to States requesting such assistance. The Secretary shall use, whenever practical,

the expertise of national organizations concerned with youth camp safety for such assistance.

GRANTS TO STATES

SEC. 8. (a) The Secretary may make grants to States for the develpment of youth camp safety plans in accordance with section 7 of the Act, to States which have in effect plans approved under section 7 to assist such States with plan initiation and training costs, and to States for the early operation and improvement of youth camp safety programs. In determining the amount of a grant for implementation of a State plan, the Secretary shall consider the comprehensiveness of that plan. No such grant may exceed 80 per centum of the cost of developing and carrying out the State plan.

(b) Payments under this section may be made in installments and in advance or by way of reimbursement with necessary adjustments on account of underpayments or overpayments.

INSPECTIONS, INVESTIGATIONS, AND RECORDS

SEC. 9. (a) In order to carry out his duties under this Act, other than the provisions of section 7 (d), the Secretary or his authorized representative, upon presenting appropriate credentials to the youth camp director, may enter and inspect at reasonable times, within reasonable limits, and in a reasonable manner, any youth camp and its records, may

question privately employees and may investigate facts, conditions, practices, or matters to the extent he deems it necessary or appropriate.

(b) In making his inspections and investigations under this Act the Secretary may require the attendance and testimony of witnesses and the production of evidence under oath. Witnesses shall be paid the same fees and mileage that are paid witnesses in the courts of the United States. In case of a contumacy, failure, or refusal of any person to obey such an order, any district court of the United States or the United States courts of any territory or possession within the jurisdiction of which such person is found, or resides or transacts business, upon the application by the Secretary, shall have jurisdiction to issue to such person an order requiring such person to appear to produce evidence if, as, and when so ordered, and to give testimony relating to the matter under investigation or in question, and any failure to obey such order of the court may be punished by said court as a contempt thereof.

(c) To determine the subject areas in which youth camp safety standards are necessary and to aid in promulgating meaningful regulations, youth camp operators subject to the provisions of this Act shall be required to report annually, on the date prescribed by the Secretary, all accidents resulting in death, injury, and serious illness, other

than minor injuries which require only first aid treatment and which do not require the services of a physician, or involve loss of consciousness, restriction of activity or motion, or premature termination of the camper's term at the camp. Youth camps (other than travel camps involving interstate travel and Federal recreational youth camps operated by a Federal agency) operating solely within a State which has in effect a State plan approved under section 7 shall file their reports directly with that State, and the State shall promptly forward such reports on to the Secretary. All other youth camps, including travel camps, shall file their reports directly with the Secretary. The Secretary shall compile the statistics reported and include summaries thereof in his annual report to the President and Congress.

(d) Any information obtained by the Secretary, or his authorized representative, under this Act shall be obtained with a minimum burden upon the youth camp operator and with full protection of the rights of youth camp staff members. Unnecessary duplication of efforts in obtaining information shall be reduced to the maximum extent feasible.

(e) A representative of the youth camp staff director and a representative authorized by the youth camp staff shall be given an opportunity to accompany the Secretary or his authorized representative during the inspection. Where there is no authorized youth camp staff representative, the Secre-

tary or his authorized representative shall consult with a reasonable number of youth camp staff members concerning the matters of health and safety.

ENFORCEMENT BY SECRETARY

SEC. 10. (a) In any State with a plan approved under section 7 in which the Secretary determines that there is a pattern of violations which the State permits to remain uncorrected by youth camp operators, the Secretary shall withhold funds from the State in accordance with the provisions of section 7 (d).

(b) In any State without an approved plan under section 7, the Secretary shall, after making reasonable annual inspections pursuant to such regulations as he may prescribe, provide for the citation of youth camp operators for any violation of any standard, rule, or order promulgated pursuant to this Act. Regulations prescribed pursuant to this subsection shall provide that the Secretary shall within a reasonable time after such inspection notify the youth camp operator by certified mail of the penalty, if any, proposed to be assessed under section 12 (b) and that such operator has 15 working days within which to notify the Secretary that he wishes to contest the citation or proposed assessment of penalty. If, within 15 working days from the receipt of a notice or of a citation under this subsection, the youth camp operator fails to notify the Secretary that he intends to con-

test the citation or proposed assessment of penalty assessed under section 12 (b) within such time, the citation and the assessment, as proposed, shall be deemed a final order of the Secretary and not subject to review by any court or agency.

(c) The Secretary shall afford an opportunity for a hearing in accordance with section 554 of title 5, United States Code, but without regard to subsection (a) (3) of that section, to any youth camp operator issued a citation or notice of a proposed penalty under procedures promulgated pursuant to subsection (b) of this section, or subject to penalties under section 12, and the hearing shall be conducted by a hearing examiner appointed under section 3105 of title 5, United States Code.

(d) Any youth camp operator adversely affected by the decision of the hearing examiner may obtain a review of the decision in the United States court of appeals for the circuit in which the youth camp in question is located or the youth camp operator has his principal office by filing in the court within 60 days following receipt of notice of the decision a petition to modify or set aside in whole or in part the decision. A copy of the petition shall forthwith be served upon the Secretary, and thereupon the Secretary shall certify and file in the court the record upon which the decision complained of was issued as provided in section 2112 of title 28, United

States Code. Upon such filing the court shall have jurisdiction of the proceedings and of the question determined in them, and shall have power to grant such temporary relief or restraining order as it deems just and proper, and to make and enter upon the pleadings, testimony, and proceedings set forth in the record a decree affirming, modifying, or setting aside in whole or in part, the decision of the examiner and enforcing the decision to the extent that it is affirmed or modified. The commencement of proceedings under this subsection shall not, unless ordered by the court, operate as a stay of the decision of the examiner.

(e) The findings of the hearing examiner with respect to questions of fact, if supported by substantial evidence on the record considered as a whole, shall be conclusive. If any party shall apply to the court for leave to adduce additional evidence and shall show to the satisfaction of the court that such additional evidence is material and that there were reasonable grounds for the failure to adduce that evidence in the hearing before the hearing examiner, the court may order that additional evidence be taken before the hearing examiner and be made part of the record. The hearing examiner may modify his findings as to the facts, or make new findings, by reason of additional evidence so taken and filed, and it shall file any modified or new findings, which findings with respect to questions of fact, if supported by

substantial evidence on the record considered as a whole, shall be conclusive, and his recommendations, if any, for the modification or setting aside of his original decision. Upon the filing of the record with it, the jurisdiction of the court shall be exclusive and its judgment and decree shall be final, except that it shall be subject to review by the Supreme Court of the United States, as provided in section 1254 of title 28, United States Code. Petitions filed under this subsection shall be heard expeditiously.

CONSULTATIVE SERVICES

SEC. 11. Upon the request of any youth camp operator, director, or staff, or during any inspection under section 9 (a), the Secretary shall provide consultative services to youth camps in States which do not have in effect a State plan approved under section 7. No citations shall be issued nor shall any civil penalties (except penalties for repeated violations under section 12(a)) be proposed by the Secretray upon any inspection or visit at which consultative services are rendered after such request, but if, during such inspection or visit, an apparent serious violation of any standard, rule or order promulgated pursuant to section 7, or of any regulations prescribed pursuant to this Act is discovered, the Secretary shall issue a written notice to the youth camp operator describing with particularity the nature of the violation and the action which must be taken within a reasonable period

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of time specified by the Secretary for the abatement of the violation. Where a youth camp operator fails to comply with the abatement instructions within the prescribed period, a citation may be issued as provided in section 10 or a civil penalty under section 12 may be assessed. Nothing in this section shall affect in any manner any provision of this Act the purpose of which is to eliminate imminent dangers.

PENALTIES

SEC. 12. (a) Any youth camp operator (other than operators of travel camps involving interstate travel or Federal agencies operating Federal recreational youth camps) in a State other than a State which has in effect a plan approved under section 7 who willfully or repeatedly violates the requirements of section 5 of this Act, any standard, rule, or order promulgated pursuant to section 6, or of any regulations prescribed pursuant to this Act may be assessed a civil penalty of up to $2,500 for each violation.

(b) Any youth camp operator who fails to correct a serious violation for which a citation has been issued under section 10(b) within the period permitted for its correction (which period shall not begin to run until the entry of a final order by the Secretary in the case of any review proceedings under section 10 initiated by the youth camp operator in good faith may be assessed a civil penalty of not more than $500 for each day during which such failure or

violation continues, or until the youth camp closes in its normal course of business.

(c) Civil penalties owed under this section shall be paid to the Secretary for deposit into the Treasury of the United States and shall accrue to the United States and may be recovered in a civil action in the name of the United States brought in the United States district court for the district where the violation is alleged to have occurred or where the operator has his principal office.

PROCEDURES TO COUNTERACT IMMINENT DANGERS

SEC. 13. (a) The United States district courts or other courts of competent jurisdiction shall have jurisdiction, in the case of youth camps in a State which has in effect a State plan approved under section 7 (other than travel camps involving interstate travel and Federal recreational youth camps operated by a Federal agency), upon the petition of the appropriate State official designated in such State plan or, in the case of all other youth camps, upon petition of the Secretary, to restrain any conditions or practices in any youth camp, or in any place where youth camp activities are conducted, which are such that a danger exists which could reasonably be expected to cause death or serious physical harm immediately or before the imminence of such danger can be eliminated through the enforcement procedures otherwise provided by this Act. Any order issued under this sec-

tion may require such steps to be taken as may be necessary to avoid, correct, or remove such imminent danger and prohibit the presence of any individual in locations or under conditions where such imminent danger exists, except individuals whose presence is necessary to avoid, or remove such imminent danger.

(b) Upon the filing of any such petition, the court shall have jurisdiction to grant such injunctive relief or temporary restraining order pending the outcome of an enforcement proceeding pursuant to this Act.

(c) Whenever and as soon as an inspector concludes that conditions or practices described in subsection (a) exist in any campsite or place of youth camp activity, he shall inform the affected campers, camp operators, and camp staff of the danger and that he is recommending to the Secretary that relief be sought.

VARIATIONS

SEC. 14. The Secretary, upon application by a youth camp operator showing extraordinary circumstances or undue hardship, and upon the determination by a field inspector, after inspection of the affected premises and facilities, that the conditions, practices, or activities proposed to be used are as safe and healthful as those which would prevail if the camp operator complied with the standard, may exempt such camp or activity from specific requirements of this Act.

Such exemption shall be effective only as long as the proposed conditions, practices, or activities are maintained.

ADVISORY COUNCIL ON CHILDREN AND YOUTH CAMP SAFETY

SEC. 15. (a) The Secretary shall establish an Advisory Council on Children and Youth Camp Safety to advise and consult on policy matters relating to youth camp safety, particularly the promulgation of youth camp safety standards. The council shall consist of the Secretary who shall be chairman, and 16 members, including the Secretaries of the Department of Interior and Agriculture or their representatives. The other members of the council shall include five representatives of organized camping, two representatives of other organizations with expertise in the area of camp safety, five representatives of parents of campers, campers and other consumers of the services of youth camps; and two State officials who exercise responsibility for youth camp safety in their respective States.

(b) The members of the council shall be appointed by the Secretary.

(c) The Secretary may appoint such special advisory and technical experts and consultants as may be necessary in carrying out the functions of the council.

(d) Members of the Advisory Council, while serving on business of the Advisory Council, shall receive compensation

at a rate to be fixed by the Secretary, but not exceeding $100 per day, including traveltime; and while so serving away from their homes or regular places of business, they may be allowed travel expenses, including per diem in lieu of subsistence, as authorized by section 5703 of title 5, United States Code, for persons in the Government service employed intermittently.

ADMINISTRATION AND AUDIT

SEC. 16. (a) The Secretary is authorized to request directly from any department or agency of the Federal Government information, suggestions, estimates, and statistics needed to carry out his functions under this Act; and such department or agency is authorized to furnish such information, suggestions, estimates, and statistics directly to the Secretary.

(b) The Secretary shall prepare and submit to the President for transmittal to the Congress at least once in each fiscal year a comprehensive and detailed report on the administration of this Act.

(c) The Secretary and the Comptroller General of the United States, or any of their duly authorized representatives, shall have access for the purpose of audit and examination to any books, documents, papers and records of States receiving assistance under this Act.

EFFECT ON EXISTING LAWS

SEC. 17. (a) Nothing in this Act shall be construed to supersede or to enlarge or diminish or affect in any other manner the common law or statutory rights, duties, or liabilities of youth camp operators and campers under any law with respect to injuries, diseases, or death of campers arising out of, or in the course of, participation in youth camp activities covered by this Act.

NONINTERFERENCE

SEC. 18. (a) Nothing in this Act or regulations issued under this Act shall be deemed to apply to activities of a family and its guests carried out as a purely social activity.

(b) Nothing in this Act or regulations issued under this Act shall be construed to interfere with the religious activities of any youth camp that is operated by any religious corporation, association, or society or operated for a particular religion.

(c) Nothing in this Act or regulations issued under this Act shall authorize the Secretary, a State agency, or any official acting under this Act to restrict, determine, or influence the curriculum, program, or ministry of any youth camp.

(d) Nothing in this Act or regulations issued under this Act shall be deemed to authorize or require medical treat-

ment for individuals who object thereto on religious grounds, nor shall examination or immunization of such individuals be authorized or required except during an epidemic or threat of an epidemic of a contagious disease.

AUTHORIZATION

SEC. 19. There are authorized to be appropriated to carry out the provisions of this Act $7,500,000 for the fiscal year 1976, and for each of the five succeeding fiscal years.

Senator CRANSTON. We now will proceed to our next witness, and that is Dr. Joyce C. Lashof, Deputy Assistant Secretary for Health —Programs—HEW.

Delighted to have you back once again.

STATEMENT OF JOYCE C. LASHOF, DEPUTY ASSISTANT SECRETARY FOR HEALTH (PROGRAMS), DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE, ACCOMPANIED BY WILLIAM C. WATSON, DEPUTY DIRECTOR, CENTER FOR DISEASE CONTROL, PUBLIC HEALTH SERVICE; AND FRANK LISELLA, ENVIRONMENTAL HEALTH SERVICES DIVISION, BUREAU OF STATE SERVICES, CENTER FOR DISEASE CONTROL, PUBLIC HEALTH SERVICE

Dr. LASHOF. Thank you very much, Senator Cranston.

Accompanying me this morning is Mr. Bill Watson, Deputy Director, Center for Disease Control, and Dr. Frank Lisella, Environmental Health Services Division.

Senator CRANSTON. Thank you very much.

We welcome all three of you.

Dr. LASHOF. It is a pleasure for me to be here today to discuss programs for youth camp safety and health, to comment upon S. 258, and to present the Department's proposed legislation on this subject.

Youth camp safety has had congressional interest since hearings were first conducted on this subject during the 90th Congress. We share the Congress' concern for the health and safety of children and youth who attend camps throughout the Nation. As you know, Vice President Mondale supported youth camp safety legislation when he was in the Senate.

Since 1973, the Center for Disease Control has devoted an increasing effort to the prevention of avoidable illness, injury, and death among youth campers. A variety of technical materials and other technical assistance have been provided to help States upgrade their programs. In addition, we have attempted to facilitate communication and cooperation among the many public and private agencies concerned with youth camping.

Historically, public health programs have been a shared responsibility with definitive roles for both the Federal and State Governments. By tradition and custom, youth camp safety and health programs represent a clear instance in which States are best equipped to implement program activities. They should take the lead in implementing youth camp safety and health programs since the characteristic focus for programs designed to make camping safer is one in which State governments work closely with local governments, camping organizations, and parent and youth groups at the community level.

DEPARTMENT PROPOSAL

Accordingly, we are proposing legislation which contains an approach based on appropriate roles for each segment of the Federal/State/camp operator triad. Specifically, Mr. Chairman, our proposal would:

Require the Secretary to develop and publish in the Federal Register model youth camp safety and health standards;

Authorize the Secretary to provide grants or technical assistance to States that want to develop a comprehensive youth camp safety and health program;

Allow any State which has a plan approved by the Secretary to authorize youth camps in that State to advertise compliance with the Federal model youth camp safety and health standards. The Secretary may withdraw approval where the State does not comply with the plan; and

Authorize $2 million for fiscal year 1979 and each of the next 5 fiscal years to carry out its provisions.

However, we do not contemplate requesting any additional appropriations for the first year. During fiscal year 1979, we will develop model standards and regulations for grant issuance as well as continue our present technical activities. Under our proposal, the Secretary would have specific authority to assist States for the purpose of expanding their youth camp safety and health activities by:

Coordinating existing education and enforcement activities;

Creating or designating an appropriate State agency for administration;

Developing and implementing safety and health programs directed toward specific camping activities;

Developing and conducting seminars and other short term training courses;

Designing and implementing procedures and systems for reporting of illnesses and injuries; and

Developing programs to monitor compliance with State standards and regulations.

Our proposal would build upon much of the developmental work which has been carried out by the Center for Disease Control in this area during the last 4 years. It would enhance our capacity to build effective youth camp safety and health programs at the State level. It would provide assistance to those States which want to implement or further develop a youth camp safety and health program without imposing Federal enforcement. It would give the consumer, by choosing those camps which comply with model Federal standards, the power to influence the marketplace and encourage States to carry out programs consistent with the Federal standards.

COMMENTS ON S. 258

While the Department agrees with the intent of S. 258, we cannot endorse some of its provisions. We especially believe that enforcement of youth camp safety standards in those States without approved plans is not an appropriate Federal function nor an appropriate use of Federal resources. The potential bureaucracy resulting from such a proposal could be substantial. In addition, the States have traditionally been responsible for the protection of public health; and youth camp safety and health activities represent a clear instance where the States are best equipped to meet public health needs. The nature and extent of current camping practices

make it unrealistic for the Federal Government to intervene effectively.

S. 258 also proposes an advisory council on youth camp safety. We believe an advisory council would be costly and would duplicate efforts already undertaken by CDC and by many States.

CONCLUSION

In summary, we believe that our concerns over the health and safety of children at camps can best be met by optimizing the existing health and safety systems in the States through technical and financial assistance from the Federal sector. The legislation which we are proposing will, we believe, allow us to build upon this concept and expand our activities in this important program for the health of children. The Department is prepared to work with your subcommittee in order to develop the best possible legislation.

Mr. Chairman, that concludes my formal testimony; my colleagues and I will be pleased to respond to any question you or other members of the subcommittee may have. Thank you for giving us the opportunity to present the views of the Department.

Thank you.

Senator CRANSTON. Thank you very much.

Thank you for your brief, succinct and helpful testimony.

I do have some questions that I would like to ask you.

HEW testified before the House Subcommittee last April, almost 1 year ago, that the administration's review of the youth camp safety issue would be completed by January of 1978, and included in the President's fiscal year 1979 budget.

Nothing in the budget addressed this issue, but your testimony today indicates that you have formulated a position and will be submitting legislation that you outlined.

What fiscal year 1979 budgetary provisions have been made for enactment of legislation?

Dr. LASHOF. We have not identified any additional funds in the fiscal year 1979.

We have allotted in the budget approximately $60,000 to $70,000 for approximately 1 to 1½ man years of labor during which time we would anticipate during fiscal 1979 the developing of the model standards and the technical guidelines, the grant regulations and continue the technical assistance activities that we have been doing, but then under the legislation that we will be submitting to you. We hope no later than today, or tomorrow, it will be in your hands.

Senator CRANSTON. The actual bill?

Dr. LASHOF. Yes.

Under that, which would provide for—an authorization of up to $2 million, we would not anticipate actually budgeting for that money until fiscal 1980, at which time we would be prepared to.

Senator CRANSTON. So you are seeking no new money, in effect?

Dr. LASHOF. Not for fiscal 1979.

Senator CRANSTON. In last April's testimony before the House Subcommittee, the administration witnesses testified that while the administration's comprehensive review of the youth camp safety

issue took place, HEW would continue to assist States to adopt and enforce youth camp safety standards of their own.

Specifically, what have you done in the last year in this regard?

Dr. LASHOF. Well, for one, we have distributed our compendium of State laws to the youth camp safety personnel in every State.

We have alerted each State of a possible increase in Rocky Mountain spotted fever during the summer. We began work on the safety and health guidelines relating to natural disasters and aquatics.

We revised the existing State statutes and regulations publication and distributed them to State agencies and camping personnel and camp operators. Obviously we have done a great deal of thinking about what type of legislative proposal we think is appropriate for this issue, and the bill that we will submit to you certainly represents the essence of that thinking.

Senator CRANSTON. How much money is expended by HEW for those activities?

Dr. LASHOF. Roughly $60,000 to $70,000.

Senator CRANSTON. How many HEW employees are working in this area?

Dr. LASHOF. One to one and a half person-years.

Senator CRANSTON. Is the entire Federal effort located in the Atlanta Center?

Dr. LASHOF. Yes.

Senator CRANSTON. Do States initiate requests for assistance or does HEW take any affirmative steps to seek out States which appear to need help?

Dr. LASHOF. Primarily the States initiate the action and we respond.

On the other hand, except when we are alerted to diseases like Rocky Mountain spotted fever, that type of information goes out to all States. In our general communications between the CDC bureaus and the States, we apprise them of the availability of this resource and tell them to ask for it.

As a general practice, the Center for Disease Control does not go directly to the States, except upon request.

Senator CRANSTON. Did you work with any of the four States which considered but rejected youth camp safety legislation last year?

Dr. LASHOF. Pardon?

Senator CRANSTON. There were four States that considered and then rejected youth camp safety legislation.

Did you work with those States?

Dr. LASHOF. I think Dr. Lisella could answer that.

Senator CRANSTON. Dr. Lisella?

Dr. LISELLA. We had minimum amount of contact with the camping people in Maryland.

Senator CRANSTON. Very little contact with any of the four?

Dr. LISELLA. That is right.

We knew that they were using our materials but we did not offer direct consultation.

Senator CRANSTON. Why do you think it was that these States decided not to enact legislation?

Dr. LISELLA. That would be pure speculation on my part.

Senator CRANSTON. You do not have any hard information—on why these States decided not to enact legislation?

Dr. LISELLA. The following information is offered for the record concerning the four States who considered legislation last year:

Maryland passed a youth camp safety bill through the House and the bill is presently in the Senate. The health department expects passage this year.

The Massachusetts legislature introduced and defeated a bill that would transfer authority for youth camp safety from the Department of Public Health to the Office of Child Services. Massachusetts, however, is already one of the 12 States with a comprehensive youth camp program and the Department of Public Health is now in the process of rewriting their regulations along the lines of the CDC suggested regulations. Public hearings will be held in July 1978.

A youth camp safety bill was introduced in North Carolina that would expand their regulations to cover safety standards in camps and transfer the responsibility of youth camps to the Department of Natural Resources. The bill was defeated.

Rhode Island is now considering a youth camp safety bill which will bring their regulations in line with the CDC suggested regulations. The bill was not defeated, but sent back to committee for technical changes. The Department of Health expects the bill to pass.

Senator CRANSTON. Why do you think so few States have actually adopted comprehensive laws in this area?

Dr. LISELLA. I think generally if you look at the situation, the States that have the highest density of camps in the United States have legislation or have made some provisions for supervising the camps within their boundaries.

Dr. LASHOF. Our survey shows that about 12 States have what we would call fairly comprehensive sets of regulations that cover the areas that we would cover in the Federal guidelines.

Another dozen States cover about 50 percent of the things that we cover and one of the reasons, just from my State experience, that you may not have a comprehensive State law, is that the responsibility may be divided into different units in State government and within State authorities, so that the water safety program may be overseen even in camp by the pool section or the environmental health section. The pool section, may set such activities as pool inspections; drinking water would be handled by the general environmental unit, sewage handled by the environmental unit.

So there are many pieces that may indeed be going on in many of the States without it being pooled together into a piece of overall program.

But we would certainly encourage the States to pool that together.

Senator CRANSTON. Do you think the existing Federal effort, through the Atlanta Center, has been successful in assisting States to implement their own laws?

Does it have any real impact?

Dr. LISELLA. We have more requests than we can actually honor.

We do believe that, particularly with the publication of the State statute and regulations, that we have made some very significant inroads to improving conditions within the States.

There are many organizations that use our publication and others, as somewhat of a foundation for the improvement of their own programs.

Senator CRANSTON. Up to now, however, you have not sought more funds?

Dr. LISELLA. I am sorry?

Senator CRANSTON. Up to now, however, you have not sought more funds to expand that work?

Dr. LISELLA. That is right.

Senator CRANSTON. Could you give us the two lists you mentioned, the 12 States, the two different lists of 12 States?

Dr. LISELLA. Certainly.

[The following was received for the record:]

STATES WITH COMPREHENSIVE PROGRAMS

Twelve States have either statutes or regulations that constitute a comprehensive program. However, 24 States have statutes and/or regulations that cover more than 50% of the categories that are considered important.

CATEGORIES

Personnel; Program Safety; Site and Facilities; Personal Health, First Aid & Medical Services; Sanitation and Food; and Transportation.

States with comprehensive programs

California, Colorado, Connecticut, Maine, Massachusetts, Michigan, Mississippi, New Jersey, New York, Tennessee, Texas, and Wisconsin.

States with 58 to 64 percent of categories

Arizona, Arkansas, Illinois, Kentucky, Minnesota, Nebraska, New Hampshire, North Carolina, Ohio, Rhode Island, South Carolina, and West Virginia.

Senator CRANSTON. The HEW publication on youth camp safety and health includes a suggested State statute and regulations for youth camp safety.

The publication specifies that the suggested State statute could be used to establish a firm legislative base for the initiation or modification of State youth camp safety programs within the State and the recommended regulations would be minimal State regulations.

What responses have you had from States with respect to the suggested State statute?

Dr. LISELLA. The reaction varies considerably—to many of the groups that we have spoken with around the country, the reaction has been very mixed.

In California, for example, talking to individuals out there, they feel that our minimal recommendations are, in fact, basic.

There are other States and other specific groups within the country that feel our regulations are entirely too stringent, thus we are faced with the entire gamut of feelings and philosophy with regard to the comprehensive nature of those regulations.

Senator CRANSTON. With respect to your suggested minimal regulations for youth camps, how many States currently have regulations which would require the enforcement of youth camp safety standards comparable to or more stringent than those under your recommended approach?

Dr. LISELLA. My general impression now is that there would be just 10 to 12 that would fall in that category, that either have a statute

and/or regulations specific enough to be matched with our recommendations.

That is not to say that the other States do not have programs as Dr. Lashof pointed out.

Oftentimes, these authorities are vested in many agencies at the State level, consequently there are duplications of authority.

Senator CRANSTON. If there has been controversy over the minimal standards, how has that been resolved?

Dr. LISELLA. The general line of controversy that we were confronted with initially had to do with the fact that the regulations did not make any provisions for short-term group camps.

We called together a group of individuals, in fact, many of the people represented camping organizations throughout the country, and prepared a draft in regard to what we felt were the needs at that time. We proceeded accordingly to revise those regulations which we committed ourselves to at the House hearings last April. That revised version of the regulations was made available in October of 1977.

The second criticism that we received fell in the area of making camps accessible to handicapped campers and we eliminated that particular objection by incorporating standards for making camps accessible to the handicapped. In effect this represents the recommendations of the American National Standards Institute, and those recommendations are now contained in the revised publications.

Senator CRANSTON. If legislation were enacted, is it likely that the HEW suggested State regulations would serve as the basis for the development by the Secretary of rules and regulations of youth camp safety standards?

Dr. LASHOF. Yes.

What we would be doing is taking out what we put out as model State sessions, standards, and turn those into standards rather than regulations.

Senator CRANSTON. The HEW preface to the publication states that both the statute and the regulations were published with the understanding that extensive modifications to the content may be necessary to provide for the variability of camping activities within and between States.

This caveat indicates the difficulty of developing a single national standard for safeguarding youth camping activities.

What are your thoughts on the feasibility of prescribing a single youth camp safety standard to be directly applicable across the country.

Dr. LISELLA. A single standard would be difficult because of the variability that exists in different types of camping operations. Consequently we would have to make allowances for that in any standards that were developed and in terms of dealing with the States and development of State plans, we would have to review every State plan on a case-by-case basis to assure that there was a general compliance with the particular regulation or standards in that area.

Senator CRANSTON. Would you please provide for the record, not verbally now, a description of the extent to which the Federal Government is currently involved in providing or supporting either camping sites or camping opportunities to individuals?

[The following was received for the record:]

Federally maintained campgrounds

Department of Interior:	
National Park Service	324
Bureau of Land Management	255
Bureau of Reclamation	10
Fish and Wildlife Service	5
Department of Agriculture: U.S. Forest Service	4, 743
U.S. Army Corps of Engineers	1, 124
Tennessee Valley Authority	4
Total	6, 465

Senator CRANSTON. Do States generally require that camps operating within their jurisdiction take out camp owners' insurance?

Dr. LASHOF. I am afraid we will have to submit that for the record.

Senator CRANSTON. Would you do that?

Would you also indicate to us, for the record, that of the States which have youth camp safety legislation how many require that camp owners' insurance be taken out?

[The following was received for the record:]

New York requires camps to arrange for the availability of accident and health insurance at a minimum of $1000 for accidents and $300 for illness of each camper and staff member. In addition, camps are required to include workmen's compensation for camp staff and motor vehicle insurance on camp vehicles. All vehicles used for camp transportation shall be covered by a minimum liability insurance of $100,000 for any person plus $500,000 for two or more persons. Public liability and property damage insurance is also required for the amount considered reasonable by the permit issuing official.

New Jersey requires liability insurance to be carried by youth camps and Colorado requires camps operating their own transportation units to carry liability insurance proportionate to the capacity of the vehicle. Maximum amount specified is $50,000 for injury to one person and $300,000 in one accident for vehicles carrying up to 25 passengers.

These are the only three States requiring camps to carry insurance.

Senator CRANSTON. Would you also supply us, for the record, the names and the amount of business of the leading insurance companies involved in the camp insurance business?

Dr. LASHOF. Yes, sir.

[The following was received for the record:]

The following list of camp insurers constitutes what we believe to be the major camp insurers within the United States. The amount of business which they receive is unknown by cost of premiums and claims or by number of camps insured. At least one insurer, however, has reported that medical claims are equivalent to five percent of the premiums paid.

Camp Insurers: American Income Life Insurance Company; American Youth Inc.; Camp Brokerage; Fessenden and Sykes Insurance Company; Heritage Insurance Managers; Interstate Risk Management Corp.; Mutual Security Life Insurance Company; Preferred Risk Insurance Group; R. R. Lyons Insurance Company; Rhulen Agency; and Vermont Insurance Company.

Senator CRANSTON. Testimony submitted to the subcommittee by Mr. Ed. Oulund indicates that the records of the Heritage Insurance Co. of San Antonio, Tex., show that accident claims submitted to that company decreased steadily from one in 640 camp days in 1967 to one in 871 camp days in 1976.

Do you have any reaction to those statistics?

Dr. LASHOF. No, I think without seeing the basis of them, it would be difficult.

We would be glad to look at them.

Senator CRANSTON. Would you submit your reaction for the record, if you have a reaction?

Dr. LASHOF. Yes.

[The following was received for the record:]

Since the hearing of March 21, we have had an opportunity to meet with Mr. Oulund of Christian Camping Internation and study the Heritage Insurance Managers Report. Assuming that such variables as the deductible level, the definition of a claim, and the characteristics of the camper population remain constant, it appears that these CCI camps did experience a reduction in claims per camper day. In talking with Mr. Oulund, we learned that significant changes were made in the types of activities campers engaged in, making the events less risky. We feel that this is the most likely reason for the improved record in these camps.

Senator CRANSTON. Do you think that the statistic is representative of the experience of the camping insurance industry in general?

If you do not know, could you try to find out?

Dr. LASHOF. We will try to find out and look into that.

[The following was received for the record:]

The Heritage Insurance Managers Report is based on a highly specialized group of camps. We do not think that this experience is necessarily representative of the entire camping industry. Although we have contacted several of the major insurance carriers, information regarding the specifics of their experience with youth camping populations has not been forthcoming.

Senator CRANSTON. What are the various ways in which States now license youth camp operations?

Dr. LISELLA. There are a variety of schemes.

Some States merely issue the license because the camp has a food service facility. Others issue a license because there is a swimming pool or bathing beach.

Some issue licenses on the basis of the authority in a comprehensive statute, covering the entire camp facility, the personnel in camp. Colorado is an example of that particular type of situation.

There is considerable variety along the lines of licensing and/or certification.

Senator CRANSTON. Thank you very much.

Would you give us a breakdown of that in detail?

[The following was received for the record:]

Twelve States require camps to apply for a license to operate a facility with verification by the license issuing agency that the camp has met certain requirements. Eight of these States are among the twelve States considered to have comprehensive programs.

Seventeen States require camps to apply for a permit with acknowledgement from the issuing agency completed before operations begin. A permit may or may not require verification that certain criteria be met. Kentucky, for instance, requires all youth camp regulations be met before a permit is issued while Nevada requires only a permit for food service operations.

Only three States require camps to inform the authoritative agency of their intent to operate a camping facility through a registration system.

Senator CRANSTON. That concludes the questions that I have for you.

Thank you very much.

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It has been helpful to have you here and we will look forward to seeing the bill shortly.

We may have some written questions on the legislation after we see it.

We are going to take a brief break while I run to another committee to get a quorum.

I will be right back.

[Recess.]

Senator CRANSTON. The committee will come back to order.

We will now hear from a panel, Alan J. Stolz, legislative chairman, American Camping Association, accompanied by Armand Ball, executive vice president, American Camping Association, Jack E. Buttram, executive director, Youth Camp Safety Committee, on behalf of Dr. Kenneth Hay, director, the Wilds Christian Camp and Conference Center, and Mr. Lawrence L. Graham, president, Camping Association for Mutual Progress.

Good morning.

If you will proceed in whatever order you see fit.

If you can attempt to summarize your main points in not more than 5 minutes, to expedite our proceedings, I would appreciate it.

STATEMENTS OF ALAN J. STOLZ, LEGISLATIVE CHAIRMAN, AMERICAN CAMPING ASSOCIATION, ACCOMPANIED BY ARMAND BALL, EXECUTIVE VICE PRESIDENT, AMERICAN CAMPING ASSOCIATION; JACK E. BUTTRAM, EXECUTIVE DIRECTOR, YOUTH CAMP SAFETY COMMITTEE; REV. RICHARD L. GRAMMER, PASTOR, GLEN BURNIE, MD.; AND LAWRENCE L. GRAHAM, PRESIDENT, CAMPING ASSOCIATION FOR MUTUAL PROGRESS, A PANEL

Mr. STOLZ. My name is Alan J. Stolz from Westport, Conn., and I represent the American Camping Association as national legislation chairman on the organization's board of directors. My other camping background and titles as a volunteer in professional camping work are in the prepared materials sent to your committee March 1, in anticipation of the original hearing date of last week. In my personal capacity, I own and operate Camp Cody for Boys, a private summer camp at West Ossipee, N.H. I have attended a variety of camps every summer since first attending as a child in 1938. I've owned Camp Cody since 1950 and have held the ACA's national legislative portfolio since 1973.

The association I represent is the largest youth camping organization in the United States today, and is the only such group that represents all types of camps . . . private, agency, religious, day, resident, travel and all their variations and activities.

Again, in our earlier materials, we submitted to your committee a more detailed statement, which I assume is now included in this formal record, and we also sent you a copy of the national "ACA Standards" book, and a copy of the "A.C.A.'s Parents' Guides to Accredited Camps."

Senator CRANSTON. That will be inserted in the record at the conclusion of your testimony.

Mr. STOLZ. I appreciate that.

Our ACA standards are the most demanding in the Nation, and a copy of the "ACA Standards" book and a copy of the regional "ACA Parents' Guide to Accredited Camps" for your home areas was sent to each of you gentlemen with my earlier, formal statement.

I'd like to introduce my colleague, Mr. Armand B. Ball, Jr., the executive vice president of the American Camping Association, from our national office at Bradford Woods, Martinsville, Ind. Mr. Ball is himself a former camp director from Minnesota, who has served as an executive with youth camping agencies and has a wide personal background in camping work.

Mr. Chairman, I am going to digress for 1 second to try to help the committee answer a question of the former witnesses.

From our perspective in the ACA, we consider 13 States to have some type of state-wide youth camp safety regulations, either centralized or decentralized type of control, as was alluded to by the ladies and gentlemen from CDC.

Those States are New Hampshire, Maine, Vermont, Mississippi, New York, California, Connecticut, Kentucky, Texas, New Jersey, Michigan, Illinois, and Colorado, and as indicated they do have a wide variety of endorsement and rating systems.

Also, for the record, because this is the latest state publication to come out, here are regulations concerning the safety and sanitation of youth recreation camps in the State of New Hampshire. It was the first State to have such camping regulations. The committee wishes a copy of this newest revision, just published 30 days ago.

Senator CRANSTON. Thank you.

We would like to have it.

[The title of the material referred to follows:]

"Regulations governing the safety and sanitation of youth recreation camps (with related texts, laws and advice to camp directors)" published by the Water Supply & Pollution Control Commission; Department of Health; State of New Hampshire (Dec. 1977).

Mr. STOLZ. The American Camping Association has been involved in these hearings for 11 years and as the committee probably knows, we formally endorsed H. R. 6761, as offered by Congressman Joseph Gaydos, and Ronald Sarasin, in the House of Representatives last spring.

That bill still awaits floor action and we hope for review of some technical amendments that we feel are needed. Basically, we consider that H.R. 6761 is a good bill from the viewpoint of the American public, from the professional youth camp operator.

There are, of course, those who do not share our feeling, and reasons therefore are detailed in my earlier prepared statement.

However, I would like to note for the record that the American Camping Association also is speaking in support of H.R. 6761, on behalf of several major religious organizations in the United States today, and this includes the Catholic Camping Council, the Jewish Welfare Board, the Lutheran Church of America, and the Salvation Army. These religious groups all join with our endorsement of H.R. 6761.

Today, we are ostensibly trying to review Senator Ribicoff's bill, S. 258, which we feel could be amended to bring into closer alignment

with H.R. 6761, from which a joint House and Senate Committee can work.

I am going to take the remaining few minutes to discuss another type of youth camp and safety legislation, even though we do not have a bill before us at this time to detail my comments.

I think it is important that the concept be identified.

Generally speaking, this form of youth camp safety legislation stems from an effort in 1974 by then Senator Taft, and the concept was also advocated by Mr. Anderson and then rejected in the House of Representatives a year ago. I must say to you today that the American Camping Association cannot and will not support that particular concept of youth camp safety legislation. On February 27, 1978, our national board of directors unanimously approved the following motion: "That ACA not support any version of Federal youth camp safety legislation that advocates previously rejected concepts offered by Senator Taft or Representative Anderson."

Our national board also recommended Senate adoption of the current House bill. Now, Mr. Chairman, we have stated many times in congressional testimony that we fully support the idea of Federal youth safety legislation because there are so many States that are doing absolutely nothing in this regard and about 60 percent of the camps in the country do not meet the accreditation requirements of the American Camping Association.

In fact, last year almost one-fifth of the camps that the A.C.A. "visited" for accreditation inspections were rejected as not being qualified. We feel that this is a basic protection, necessary for all children, at all camps, in all states.

However, we are not going to support what we feel to be poor or misleading legislation, for emotional or public relations motives, even though stated intent of the bill might seem worthy on its surface.

Some reasons for the action of our national board of directors in rejecting and condemning the legislation identified with former Senator Taft are these points:

First: There is no enforcement of youth camp safety regulations in all States. We in ACA believe in equal protection under law for all youngsters, in all camps, and in all States, and statistics gathered therefrom will furnish the first comprehensive national data on camp health and safety. Anything less cannot be called national protection for all campers.

Second: There are no mandated State or Federal youth camp advisory boards. We in ACA believe that such mandatory boards are absolutely essential to prevent a runaway Federal or State bureaucracy and to provide professional and consumer input to all regulatory agencies via the Secretary of Health, Education, and Welfare, and each State's Governor's Advisory Council.

The third reason is that we feel this concept misleads American families that somehow their children are all protected. We in ACA believe facts clearly show few States are interested in participating voluntarily in youth camp safety programs, leaving campers in other States without any such benefits and parents with little way of knowing differences, unless the camp is ACA accredited.

The fourth reason for our feeling is that this concept of legislation permits camps in participating States to advertise approval by the U.S. Government. We think that this is an unwarranted "implied warranty," misleading the public, as all that is covered is minimal health and safety conditions with no concern for other areas of quality control that professionals in the field deem necessary for good camp operations.

The question of an approved camp creates another difficulty, Senator. Our fifth objection therefore is that obviously a camp that is approved by the Federal Government can only take place where there is a State voluntarily taking part in such a program. ACA believes that this carries an unintended but real slur or negative inference on fine camps in nonparticipating States, that could harm reputation. It also could restrict approvals in other Government programs that require full compliance in multiple Federal activities, especially in the nonprofit sector.

Our sixth objection is the limited and pecular funding in this type of concept. We in ACA believe that the moneys allocated would not permit the Secretary of HEW to administer youth camp safety programs, even should more than the 13 States now having such programs would wish to do so. Also, the funding is above operational costs for a State, and highly restricted, and thus is no real incentive at all. In fact it seems to be a bonus and waste of taxpayer money rather than enabling funds to allow a State short of funds to carry out such a program.

Mr. Chairman, if the Senate is to seriously proceed with youth camp legislation, we urge the Senate adoption of H.R. 6167, or to amend S. 258, to conform to the recommendations we have already submitted. Otherwise, I think we are just wasting taxpayers' dollars and prolonging the dozen years of study on the issue.

The American Camping Association is fully ready to assist both Houses of the Congress and the administration in reaching a meaningful youth camp safety bill and Mr. Ball and I would be pleased to answer any questions. Thank you for your courtesies, Senator Cranston, and your attention.

Senator CRANSTON. Senator Riegle has a number of written questions he wanted to submit to you and we will give you those for responses in the record.

[The prepared statement of Mr. Stolz and material referred to follows:]

AMERICAN CAMPING ASSOCIATION, INC.
BRADFORD WOODS
MARTINSVILLE, INDIANA 46151

March 1978

THE YOUTH CAMP SAFETY ACT, S-258, ET AL, 95TH CONGRESS

ORAL TESTIMONY OF THE AMERICAN CAMPING ASSOCIATION BEFORE THE SUBCOMMITTEE ON CHILD AND HUMAN DEVELOPMENT, OF THE COMMITTEE ON HUMAN RESOURCES OF THE UNITED STATES SENATE

Honorable Alan Cranston, Chairman

Washington, D. C. March 21, 1978

Witnesses:

Mr. Alan J. Stolz of Westport, Connecticut and West Ossipee, New Hampshire, National Legislation Chairman

Mr. Armand B. Ball, Jr., of Martinsville, Indiana, Executive Vice President of American Camping Association

Senator Cranston, Senator Riegle, Senator Hayakawa, good morning, and thank you for this opportunity to present the views of the American Camping Association on Youth Camp Safety legislation. My name is Alan J. Stolz from Westport, Connecticut, and I represent the American Camping Association as National Legislation Chairman on the organization's Board of Directors. My other camping background and titles as a volunteer in professional work are in the prepared materials sent to your committee March 1st, in anticipation of the original hearing date of last week. In my personal capacity, I own and operate Camp Cody for Boys, a private summer camp in West Ossipee, New Hampshire. I have attended a variety of camps every summer since first attending as a child in 1938. I've owned Camp Cody since 1960 and have held the ACA's legislative portfolio since 1973.

The Association I represent is the largest youth camping organization in the United States today, and is the only such group that represents all types of camps...private, agency, religious, day, resident, travel and all their variations and activities. Each of the thousands of ACA accredited camps has been visited by trained experts to help assure compliance with quality controls in operations. Our ACA Standards are the most demanding in the nation, and a copy of the ACA STANDARDS book and a copy of the regional ACA PARENTS' GUIDE TO ACCREDITED CAMPS for your home areas was sent to each of you gentlemen with my earlier, formal statement.

I'd like to introduce my colleague, Mr. Armand B. Ball, Jr., the Executive Vice President of the American Camping Association, from our national offices at Bradford Woods, Martinsville, Indiana. Mr. Ball is himself a former camp director from Minnesota, who has served as an executive with youth camping agencies and has a wide personal background in camping work.

Gentlemen, this hearing is ostensibly to review S-258, the Youth Camp Safety Act offered by Senators Ribicoff, Humphrey, Magnuson, Pell and Weicker. We in the ACA have joined in

eleven years of such hearings in both the House and Senate. There are today several concepts, or versions on Youth Camp Safety methodologies being debated on the Hill, and I'll take a moment to summarize our feelings on them.

You must also understand that the American Camping Association has publicly endorsed H. R. 6761, as offered by Congressmen Joseph Gaydos (D) of Pennsylvania and Ronald Sarasin (R) of Connecticut. Since passing Mr. Perkins' full Committee on Education and Labor just a year ago, that bill still awaits full House action. H. R. 6761 needs a few technical amendments that have been promised in conference committee, and we consider it a good bill from the viewpoint of the American public and the professional youth camp operator. Feelings of those who do not share our view are elaborated in my formal statement and in House records.

Senator Ribicoff offers a slightly different bill in S-258, and I believe will endorse a few changes that have been strongly pointed out as fundamental needs. This would bring S-238 in closer alliance with H. R. 6761, from which point a joint House and Senate Committee can evolve a final document.

Gentlemen, there is another variety of Youth Camp Safety legislation, even though we do not have a current bill of this type before us. The concept is generally identified with former Senator Taft, and was also advocated and then rejected in the House. I must state to you today that the American Camping Association cannot and will not support that form of Youth Camp Safety Legislation. On February 27, 1978, the ACA's National Board of Directors unanimously approved the following motion on Youth Camp Safety:

> "That ACA not support any version of Federal Youth Camp Safety that advocates previously rejected concepts offered by Senator Taft or Representative Anderson."

As I have repeatedly stated in prior Congressional testimony, the American Camping Association supports the concept of good Youth Camp Safety legislation. However, we shall not support what we feel to be poor or misleading legislation for emotional or public relations motives even though a stated "intent" of such a bill may seem worthy on the surface. Some reasons for the action of our National Board of Directors and for our condemnation of the Senator Taft-type concepts are:

1. There is no enforcement of Youth Camp Safety regulations in all states. We in ACA believe in equal protection under law for all youngsters, in all camps and in all states, and statistics gathered therefrom will furnish the first comprehensive national data on camp health and safety.
2. There are no mandated State or Federal Youth Camp Advisory Boards. We in ACA believe that such mandatory Boards are absolutely essential to prevent a runaway bureaucracy and to provide professional and consumer input to all regulatory agencies via the Secretary of Health, Education, and Welfare and each State's Governor's Camping Advisory Council.
3. This concept misleads American families that somehow their children are all protected. We in ACA believe facts show few states are interested in participating voluntarily in Youth Camp Safety programs, leaving campers in the other states without such benefits and perents with little way of knowing differences, unless the camp is ACA accredited.
4. This type of bill permits camps in participating states to advertise "approval" by the United States government. We in ACA believe that this is an unwarranted implied warranty, misleading the public, as all that is covered is minimal health and safety conditions with no concern for other areas of quality control that professionals in the field deem necessary for good camp operations.

5. "Approved" camps in a volunteer-state program must be limited to those states that wish to participate. We in ACA believe that this carries an unintended but real slur or negative inference on fine camps in non-participating states that could harm reputations and also restrict approvals in other federal programs that require compliance in multiple federal activities, especially in the non-profit sector.
6. Funding is very limited in this concept. We in ACA believe that the monies allocated would not permit the Secretary of HEW to administer Youth Camp Safety programs, even if more than the dozen or so states that currently have such programs would voluntarily take part.

Mr. Chairman, if you are to seriously proceed with Youth Camp legislation, the American Camping Association urges the Senate adoption of H. R. 6167, or to amend S-258 to conform to the recommendations we have already submitted. We see anything less as a disservice to the American public, to the children in the nation who attend summer camp each year, and to those of us in the camping profession...it is also a waste of taxpayers' dollars to prolong eleven years of debate on this issue. As all throughout the history of these hearings, the American Camping Association remains ready to assist Committees in both Houses of the Congress, and the Administration as well, in reaching a meaningful Youth Camp Safety goal.

Your attention is appreciated Senators, and Mr. Ball and I shall be pleased to answer any questions.

# # # #

Mr. Chairman and members of the Select Subcommittee on Child and Human Development.

My name is Alan J. Stolz from Westport, Connecticut. I am the National Legislation Chairperson on the Board of Directors of the American Camping Association and the owner/director of Camp Cody for Boys, a private children's camp in New Hampshire. I am also Past President of the New Hampshire Camp Directors' Association, and I carry the legislative portfolio for New Hampshire and for the New England Camping Association as well. I am certified as a "Standards Visitor" for the American Camping Association and as such, actually visit youth camps for ACA Accreditation. In the New York area I direct public information which includes our consumer awareness efforts with news media.

The American Camping Association is a national non-profit professional organization founded in 1910 to achieve professional practices in organized camps and to interpret the role of youth camps in the United States. Within our membership are the directors and leaders of children's camps, camps for senior citizens and for special needs and families whose sponsors or owners include private individuals, community organizations, and all of the great youth-serving agencies in the nation, including Boy and Girl Scouts, the Ys, Camp Fire Girls, Boys' and Girls' Clubs, Salvation Army, and the major religious denominations. The American Camping Association's national office and full-time staff is at Bradford Woods, Martinsville, Indiana, the outdoor education site of Indiana University. Thirty-four (34) local Sections (chapters) serve the membership and public.

ACA represents some 60% of the over 10,000 camps in the country. We estimate close to 8 million children are served by the nation's camps every summer, and 4 million children attend ACA Accredited camps. In other words, our Association accredits about one-fourth of the camps in the U.S.A., but about half of all children attending organized camps attend an ACA Accredited camp. Other camps, such as within national agencies, are also influenced through participation of their national leadership. There are numerous State, area, and regional trade camping organizations that cater to specific local or vested interest segments in the youth camping movement. However, the American Camping Association is the only organization that has a quality control for camp operations of all types and can thus speak for private camping, agencies, church groups, organizations, as well as resident and day camps, travel, and other special organizations.

We have just published "The American Camping Association's Parents' Guide to Accredited Camps." In each committee member's folder will be a copy of this Parents' Guide for the section of the country that he represents.

The activities of our member camps vary as widely as the purposes, personalities and program goals of their owners and sponsors, but on one goal all youth camp leaders in the United States are absolutely united . . . . .all professionals in the camping field want to operate safe and healthy camps for those boys and girls entrusted to them. This is not just from the dedication and deep concern for children which camping people already have, but it is obviously also "good business" and necessary for each camp's reputation.

Better than anyone else, members of the American Camping Association know that there are some camps of lesser quality, which do not meet desired levels for health and safety or other operations. Reasons could be a lack of trained leadership and experience, lack of funds for proper facilities or equipment, and sometimes lack of good judgment.

In 1948, after three decades of study, the ACA published the Association's Standards for Accreditation. Now, after revisions, updating and increased demands for quality, we have produced the newest Standards document which has been field-tested for reliability, validity and objectivity. Several universities and thousands of knowledgeable practitioners contributed to the evolution of the ACA camp standards. We believe these requirements serve as a model for the entire nation in measuring four major areas of concern:

1. Site (facilities, grounds)
2. Administration (health, maintenance, and food services)
3. Personnel (qualifications, training)
4. Program (philosophy, activities)

A youth camp, being ACA evaluated or periodically re-evaluated must achieve an overall average score of at least 80% of the applicable 227 different standards and a minimum percentage (75%) in each of the four areas. There are 14 mandatory standards, concerned with fundamental health and safety requirements from which no deviation is permitted. Our Standards Visitors ("inspectors") must pass an elaborate training course before they are permitted officially to visit any camp, and remember they are already practioners in the field. Mr. Chairman, ladies and gentlemen, remember that the ACA is a voluntary organization, where camps must apply for accreditation, and ACA must, therefore, base its survival on such

accreditation. Yet, last summer almost 18% of the camps visited or revisited by this Association were declared provisional as not meeting the required ACA Standards. This means that they cannot use the Accreditation emblem nor be listed in the "ACA Parents' Guide." We are pleased to also furnish each Committee member with a copy of the current ACA Standards, and the mandatory prerequisites will be found on page 44. I should note that in this era of growing consumer awareness, more camps desire ACA Accreditation and membership, because more parents are asking if the camp is so approved. At the same time, the ACA Standards are more demanding than ever before, for quality control is the cornerstone of our membership, reputation and public credibility. In addition to these periodic re-visits or inspections, a new inspection must be completed anytime a camp has a significant change in management or site.

ACA is justifiably proud of its camps. The ACA Standards program not only serves as a guide and goal for all youth camps, but also as a guide for government agencies on the local, state and federal levels. Naturally we are pleased that ACA members can prove they are doing something about camp health and safety, and their participation in ACA activities connotes their interests in professional upgrading. We are also deeply concerned that the other, non-accredited camps, should at least be confirmed as basically healthy and safe places for children...they may be, but no one knows!

This is why since 1966, when Senator Ribicoff first introduced his Youth Camp Safety Act in the Senate, and again in 1968 when Representative Daniels introduced a companion bill in the House of Representatives, the ACA National Board of Directors has strongly supported the concept of good youth camp safety legislation. We know that we cannot speak for, nor control quality of operation of or directly influence, non-members. Speaking personally, my own involvement and support of this concept is documented with framed letters from members of the House and Senate which now date back 11 years.

To assure a clear understanding to youth camp practitioners of the proposed legislation and to be of continued assistance to the Congress, the American Camping Association has sponsored several national consultations on this legislation at which were represented all major youth-serving organizations from the total spectrum of the American camping movement. We have had constant up-dating to our colleagues in the field both at conferences and in printed materials. In addition, ACA has served as a source of expertise not only to members of the Congress but

also to the U. S. Department of Health, Education, and Welfare, countless state organizations, the news media, and consumer protection groups, and have helped prepare a vast variety of professional and government literature in this field...materials now in use throughout the nation.

The overwhelming majority of camping people, including our private camps, national agencies, and secular and religious groups have supported our position papers in concept and in detail. I would, however, be remiss if I did not point out that there is a small but vocal minority which opposes such Federal legislation. This opposition may be summarized in five categories:

(a) Those advocating State's rights issues, claiming that camp regulations are purely of local concern, even though the bills we support make such State control very plain.

(b) Those who are opposed to the unlimited life of such legislation, coupled with perpetual funding. This might be answered by an automatic review of the effectiveness and need for continuing such regulations after five years of data has been collected.

(c) Those who oppose Federal regulations on the general principle of undue influence of "big brother" or fear of a Washington bureaucracy.

(d) The extremely emotional groups who act for what they consider valid political and religious convictions and fear federal "dictatorships" of their camping programs and other related youth activities. Any federal regulations are seen as the antithesis of free enterprise. . . . "creeping socialism or Communism." These objectors had a very vocal campaign last year on behalf of their small minority, but it did, in my opinion, lead to the lack of Senate support of the Mondale Bill in the 94th Congress.

(e) Those organizations which for lack of funds fear their camps cannot meet proposed federal standards and would close, depriving their clientele of any camp experience...some still use CCC facilities of the 1930s - we submit that no matter how idealistic or commendable the sponsorship, it does not condone sub-standard operations or facilities for children.

Currently the American Camping Association considers 13 states to have meaningful health and safety regulations, and these were outlined by the Consumers Union in their new Guide Book just this month. The states are New Hampshire (the first in the country to institute such regulations), Maine, Vermont, Massachusetts, New York, California, Connecticut, Kentucky, Texas, New Jersey, Michigan, Illinois and Colorado.

In the past two years, state youth camp health and safety acts were proposed, and were then rejected by state legislatures in Massachusetts, North Carolina, Maryland, and Rhode Island. We understand that a state bill is now pending, and await federal action and/or funding in at least one other state. No doubt, with federal funding many of the states that voted down (or have not considered) a Youth Camp Safety Act would reintroduce state legislation.

These are the only states today, after years of debate, that have enacted such regulations on their own. There seems little doubt that other states either do not have that much interest in the issue, or simply cannot enact their own efforts without the benefit of federal funding.

I must call the Committee's attention to several facts, with an attempt to separate the emotion and tragedy of any camp accidents or injuries from the actual statistics. As I have already stated, no camp operator or organization would want to see any youngster hurt, and equally certain, no legislation is going to stop all accidents or injuries. What I must point out is that organized camping is already a very safe enterprise. In a report issued by the U. S. Department of Health, Education, and Welfare in 1971 (and reported in Congressional testimony in May, 1974) titled "Accidental Accidents in Youth Camps," its opening statement was "it is estimated that 250,000 injuries occur every year in youth camps in the U. S. which require medical attention. . . . ." It must be noted that that figure, which sounds huge, included an extrapolation of all infirmary cases at youth camps, including every mosquito bite, sniffle and routine treatment which are not considered significant, and hospital check-ups, xrays and lab tests reported as "negative" ... just precautionary checks by the camps. The significant portion of the Health, Education, and Welfare statement goes on to say that the injury rate for school children is 150 per thousand population per year, while the above camp figure is only 31 per thousand per year. Not only is the camp figure an overall statistic including very minor incidents, but you

must also realize that the camping today is 24 hours long and the school day is only six hours. A child spending a typical eight-week season in camp spends 155 hours more in camp than in the average school year. The report takes into account both the age groups, types of injuries, length of season, for the factors under consideration. What this shows statistically is that children in camp are more than five times safer than children in school. In spite of the fact that some illnesses, accidents and injuries do occur, this is a very heartening endorsement of the safety record in youth camps.

But, in spite of this excellent record, which has never been contravened in later studies, practitioners of the American Camping Association and our colleagues in other youth agencies still believe that until such time as all camps can meet ACA Standards that good, proper, federal youth camp legislation is needed for two major reasons:

1. The American Camping Association believes that all children in all camps should be protected for fundamental, basic health and safety conditions. A set of consistent, uniform safeguards for youth camp health and safety standards should reach all youth camps and the guidance in such a document would be a strong upgrading force. (ACA's own Standards go far beyond such minimal health and safety concerns.)
2. Poor camping experiences and accidents resulting from unsafe and unhealthy conditions reflect ill upon all organized camps, thus undermining the confidence of the American public. The benefits of a good camping experience for American youngsters is too important to permit such negative feelings to be cultivated.

Mr. Chairman, during the eleven years of Youth Camp Safety debate, two broad approaches have been offered by many Congressional proponents and HEW studies.

The first is exemplified by the current Gaydos-Sarasin Bill, HR 6761, and Ribicoff Bill S 285, which would establish federal guidelines for camp standards of operations, and reviews of each state's implementation plan for those procedures, plus federal funding of a portion of each approved state's costs for the program, including training of state personnel. Professionals in youth camping and in appropriate government agencies would comprise the State and Federal

Advisory Boards, with the federal authority nested in the office of the Secretary of Health, Education, and Welfare. In this approach, non-participation by a state, or substandard (non-acceptable) implementation by a state, would evoke direct federal enforcement of Youth Camp Safety regulations upon the camps in such a state. Federal funds to that state would be suspended in such situations.

The second, major approach is for the federal government, via HEW, to establish the model regulations and health and safety guidelines, inviting voluntary participation by the states.

Similar funding is provided for training personnel and implementing the state programs in keeping with federal criteria. Again, only those states meeting federal requirements for Youth Camp Safety provisions are funded. The Federal and State Camping Advisory Boards would be similar to the first approach.

The major difference in this approach deals with the lack of federal intervention in states not participating or deemed as not qualified. Such states and youth camps therein are essentially eliminated from the principle of government concerns for Youth Camp Safety regulations, as well as federal incentive funding. The only health and safety standards that would affect such camps would be voluntary ACA Accreditation, or, in some cases, in-house supervision by an agency's national body.

The American Camping Association has an obvious, professional dilemma when facing practical political realities of Congress enacting a Youth Camp Safety Act. We do believe that all children, in all camps, in all states deserve equal protection under law. We also realize that it may be more programatic to enact a Youth Camp Safety Act with regulations that invite voluntary state participation and no federal intervention for lack of state compliance. Voluntary state participation also means voluntary non-participation. Members of the Congress must realize that in voting for this second approach to Youth Camp Safety legislation, they shall, like Pontius Pilate, wash their hands of responsibility for a child who is injured or becomes ill as the result of an incident in a non-regulated state. Such incidents may have been prevented if Youth Camp Safety regulations had been universally enforced.

The American Camping Association clearly prefers an Act that offers <u>all youngsters</u> in all camps basic Health and Safety Standards. Yet, in the interest

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of at last seeing some progress and movement in youth camp safety, we would even endorse a procedure with limited, voluntary state participation, while noting the concerns for those children "left out" in non-complying states and in camps of unknown quality. Our concern must remain for a goal that eventually sees health and safety "basics" in every youth camp! We have a desire to begin some affirmative, if limited, action. We also believe that the many states listed, such as those that recently rejected Youth Camp Safety for lack of funds, would voluntarily participate with the federal incentive. However, even if all of those states took part, it would still have about half the nation without coverage, and campers in those states without the protection. Just as the ACA informs parents as to which camps are Accredited members, so too the government would have a responsibility to inform the public as to which states are taking part in Youth Camp Safety programs. Parents may, thinking of sending their child to a camp in another state, innocently assume that minimal camp standards are complied with nationally. This would have to be clarified in the public interest, while in no way implying any more than minimal health and safety compliance in those camps (states) that do participate. We do not feel the federal or state government should encourage public advertisement of governmental approval which offers unwarranted reliance by parents which the camp has only met minimal camp standards. Thus, it creates a false sense of security which is neither intended or desired, plus "Guarantee" by the government. They should be clearly promoted as minimum standards. ACA's Standards, for example, go far beyond such minimum regulations, and no other higher government implication nor warranty above minimal health and safety should be inferred.

We feel that two other concerns must be pointed out to Senate and House members, should the Congress go with Youth Camp Safety in the voluntary-state-participation concept.

First, is that in providing public information as to which states participate under the federal regulations program, that no slurs nor insinuations are cast upon innocent, well-run camps in non-participating states. Obviously, there shall be highly qualified camps operating in states not participating in the Federal Youth Camp Safety program. These camps could be professionally and economically harmed if lack of state action creates a negative image.

Similarly, that a camp located in a "non-participating state" must not be restricted from the benefits of federal programs, such as Title XX, Surplus Foods, Special Milk Program, etc., not being under an approved program. We would not have this concern for camps found to be below health or safety standards in states that do practice Youth Camp Safety and could thus "disqualify" a sub-standard camp for cause.

Second, we see the need of establishing in any Youth Camp Safety Act, a clear federal preeminence and jurisdiction. Dealing with camp clientele, staffing, obtaining supplies and promoting a camp's offerings, are all part of interstate commerce. Full faith and credit must be accorded by each state to camps meeting Youth Camp Safety regulations in other qualified states. We now have a growing number of situations where one state attempts to regulate the activities of a camp from another state from doing business, traveling, taking trips, hiring, advertising, etc. in the first state or affecting the citizens of that first state (campers or staff). Any Federal Youth Camp Safety regulation must establish such a principle to avoid fifty sets of confusing and competing state regulations. Permits, licenses and staff qualifications for leadership should be honored by the sister states on a reciprocal basis under the federal standards for youth camp safety requirements. The appended materials illustrate this concern.

Mr. Chairman, ladies and gentlemen, my colleagues in the American Camping Association offer you our time, expertise and data from the largest professional association for organized youth camping in the United States, and, indeed, the world. Along with you, we wish to develop a meaningful set of regulations and we trust that this testimony and our efforts in critiquing proposed legislation will be viewed as constructive and beneficial to the Congress and to the country as a whole.

We realize that not all camps in the nation can adhere to the Standards advocated by the American Camping Association. We do believe that all camps can and should meet fundamental minimum Standards of health and safety as expressed in the intent of the Youth Camp Safety Act. The following recommendations will, we believe, strengthen this proposal and will produce legislation of which we can all be proud and which we, in the American Camping Association, could then wholeheartedly support. We offer you and all government agencies our continued full cooperation. On behalf of the membership of the American Camping Association, I thank you for your understanding, your time, and your courtesy.

March 13, 1978

December, 1977 Report No. F-14 H.R. 6761

NEW YORK COUNTY LAWYERS' ASSOCIATION
14 Vesey Street
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COMMITTEE ON FEDERAL LEGISLATION

Report on H.R. 6761, 95th Cong., 1st Sess. (1977) to provide for Youth Camp Safety Programs.

RECOMMENDATION: APPROVAL WITH SUGGESTED AMENDMENTS

H.R. 6761, 95th Cong., 1st Sess. (1977), the "Youth Camp Safety Act", establishes a federal program to create safety standards for organized youth camps. The bill contemplates that state plans will be developed meeting federal standards, which will be approved under the act, thereby making the states eligible for financial assistance. Direct federal enforcement is also provided as to camps in states that do not have an approved plan. Civil penalties are authorized for camps violating the standards. Injunctive relief is authorized in cases involving imminent dangers.

The bill provides that state standards equal to or superior to those promulgated under the act are unaffected, as are common law rights and state statutory rights.

The advantages of the bill are: (1) safety standards will be imposed on some camps which are substandard and unsafe for participants, and (2) parents and young people will more freely be able to patronize camps knowing that some safety standards exist. On the other hand, there is a danger that some camps designed deliberately to provide challenge in program activities will be discouraged, because safety, may evolve into such an absolute value as to constrict a great deal of previously customary meaningful activity. It must be recognized that there is no such thing as absolute safety in any meaningful activity. This concern prompted some to criticize the entire concept of the act. See Kilpatrick, "Big Brother in Camp," N.Y. Post, 7/1/77, p. 29.

On balance, we believe that the bill would be a constructive step, provided that it preempts the proliferation of state standards involving intervention by states other than those where the camp is actually located or conducts its activities. A trend has developed of some state requirements being imposed merely because of advertising, solicitation or the obtaining of campers from a state, where the camp is actually located elsewhere. The need and justification for regulation of this type would appear to be removed upon enactment of the proposed federal law, and indeed this may be one of the advantages of federal action. The imposition of independent requirements by states as to the actual content of a camp's program or standards as to its operation, merely because of advertising or solicitation, may constitute an unreasonable burden on interstate commerce violative of the commerce clause of the Federal Constitution.[1] Such a burden would not be imposed, of course, by state laws which merely prohibit false advertising.[2]

We believe that an amendment should be added to the bill specifically preempting regulation in states other than where the camp is located or conducts actual field trips once federal standards are in place. Otherwise, three different types of regulation could apply in each instance: federal, those of the state where the camp is located, and those of the state where the camper resides. Potentially, 50 states could have different regulations in one or both categories. This would obviously be harmful, and such a result should be avoided by a properly drafted federal provision.

Consideration might also be given to different standards being applicable to camps for older people or geriatric camps where specific disclosure is made that the camp does not meet otherwise applicable "Youth Camp" safety standards designed for persons under age 18. This would be important to avoid placing all camping activities in a "strait jacket." It should be recognized that many young people, older teens and adults, need challenge, and will resort to unsafe activities themselves if challenge is not provided or offered in a meaningful and socially constructive manner.[3]

CONCLUSION

We approve the bill, but recommend amendment to exclude substantive regulation by states based on advertising or solicitation within their borders where camps are located elsewhere, and to provide different standards for "adventure" type camp activities where this classification or programming is clearly disclosed.

Respectfully submitted,

COMMITTEE ON FEDERAL LEGISLATION

Richard A. Givens, Chairman

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This report is issued by the Committee pursuant to the By-laws of the Association which permit such dissemination. It has not been submitted to the Board of Directors for approval and therefore does not necessarily represent the views of the Board.

FOOTNOTES

1. See Hunt v. Washington State Apple Advertising Commission, 97 Sup. Ct. 2434 (6/20/77); Hughes v. Alexandria Scrap Corp., 426 U.S. 794 (1976); Great A & P Tea Co. v. Cottrell, 424 U.S. 366 (1976); Allenberg Cotton Co. v. Pittman, 419 U.S. 20 (1974); Bibb v. Navajo Freight Lines, 359 U.S. 520 (1959); Dean Milk Co. v. Madison, 340 U.S. 349 (1951); H.P. Hood & Sons v. Dumond, 336 U.S. 525 (1949); Nippert v. Richmond, 327 U.S. 416 (1946); Southern Pacific Co. v. Arizona, 325 U.S. 761 (1945); Baldwin v. G.A.F. Seelig, 294 U.S. 511 (1935); Buck v. KuyKendall, 267 U.S. 307 (1925); Dowling, "Interstate Commerce and State Power: Revised Version," 47 Colum.L.Rev. 547 (1947).

2. E.g. N.Y. Penal Law §190.60, 190.75 (McKinney Supp. 1977); Cf. Bates v. Arizona, 45 U.S.L. Week 4895 (6/27/77); Reich, "Consumer Protection and the First Amendment: A Dilemma for the FTC?," 6 (Minn.L.Rev.706 (1977)).

3. Compare Franklin D. Roosevelt, First Inaugural Address, N.Y. Times, March 5, 1933, 2·Hofstadter, Great Issues in American History 351, 353 (1958); Drucker, Concept of the Corporation 140, 179 (1960 ed.); Drucker, The Future of Industrial Man 101-117 (1942); Committee on Labor & Social Security Legislation, Ass'n of the Bar of the City of New York, Report on Bills to Permit Social Security Beneficiaries to Earn Income to the Extent of their Ability Without Deductions from Social Security Benefits, 5 Reports of Committees of N.Y.C.B.A. Concerned With Federal Legislation 75 (1966); Friedan, The Feminine Mystique (1963); Cf. Givens, Toward Fuller Use of Human Resources, 17 Labor Law Journal 621, 626-29 (Commerce Clearing House Oct. 1966). Learning-by-doing can often have as much educational value as formal training, see generally Lindberg, the Democratic Classroom (1954); Hopkins, The Emerging Self (1954); Bernstein, The Education of Urban Populations, ch.I (1967); Wertheimer, Productive Thinking (1959 ed.); Dairymple, The Case for A Hiatus Between School and College, University (Princeton University, Winter 1967-68); Hawkins, The Informed Vision: An Essay on Science Education, 93 Daedalus: J.Amer. Acad. Arts & Sci., 538 (Summer 1965).

CRITIQUE ON S.258 Youth Camp Safety Act - Armand Ball and Alan Stolz, American Camping Association, Inc. - March 13, 1978

Page 3, line 9: We suggest the insertion of"(D) may include activities advertised as a 'camp' for youth regardless of the activities offered."

Page 4, lines 9 and 10: We suggest the deletion of the words "for a portion of a day" as being unnecessary.

Page 4, lines 19 and 20: We suggest the addition of the words "except where that credit operates as a camp"

Page 4, line 21: We would suggest the insertion of the word "licensed."

Page 4, lines 24: We would suggest the addition of the words "except where that credit operates as a camp"

Page 4, lines 6 and 15: We question the use of the words "permanent camp site" when there are day camps that utilize different sites daily without "temporary or permanent structures and install facilities."

Page 4, line 25
Page 5, lines 1 to 3: We would suggest the substitution of the definition developed by the Center for Disease Control HEW in collaboration with national youth and camping agencies and the American Camping Association as a better definition for "troop camp."

"Short-term group camp means an organized camping activity of more than a 24-hour period but less than 96-hour period for groups, clubs and troops for campers sponsored by an organization or a person."

Page 10, lines 1 to 3: We suggest the substitution of the following words beginning after the word "state": "Fulfill the same or equally as effective general duties described in section 5 of this Act."

It is our feeling that whatever regulations are developed at the state level should be at least equal to the general substance of the federal regulations.

Page 10, line 11: We would suggest the addition of (b)(4) as follows: "Provides for an Advisory Committee whose duties shall include (1) a review of state regulations and licensing, (2) administrative appeal board for alleged violations of camps, (3) advise the state agency on general policy related to regulations and licensing, which committee shall include among its members representatives of other state agencies concerned with camping or programs related thereto and persons representative of national or state professional, or other public or non-profit private agencies, organizations or groups concerned with organized camping, experienced campers and members of the general public having a special interest in youth camps."

In addition, we are attaching our recommendations for the personnel of the state Advisory Councils which we continue to feel is an essential ingredient of any bill that relates to youth camp safety. The ultimate responsibility for regulations must be at the state level and the persons to be regulated must be involved in the process, both from the operator and consumer viewpoint.

Page 10, lines 12 to 17: We would suggest the substitution of the following section for these lines in the bill. "Notwithstanding any other provision of law, the Secretary shall, before promulgating any standard under section 6 subsection (a) or any rule or regulation under any other provision of this act transmit such proposed standard rule or regulation to each House of the Congress. At the same time, such regulations shall be published in the Federal Register and submit it by mail to state and federal youth camp advisory committees. No such proposed standard, rule or regulation may take effect if either House or the Congress adopts a resolution within 60 legislative days of continuous session of the Congress after such proposed rule or regulation is transmitted by the Director which disapproves such proposed standard, rule, or regulation. Any such resolution

shall void the proposed standard, rule, or regulation involved. The failure of either House of the Congress to adopt any such resolution shall not be considered to be an expression by the Congress that the standard, rule or regulation involved is within the scope of authority delegated to the Director by this Act."

Page 12, line 23: We would suggest the addition of the word "associations" between the words "camps" and "to" to read "youth camp associations to States requesting such assistance."

Page 14, lines 24-25
and
Page 15, lines 1 to 4: We would propose to substitute the following language which was developed with national agencies and the American Camping Association for the Center for Disease Control in their current publications "All accidents which occur at camp and as a result the camper is sent home, is admitted to a hospital for treatment, has positive laboratory analysis or X-ray results, or is fatally injured or ill."

Page 15, line 18: We would suggest the rewording to be "with full protection of the rights of the youth camp, its operator and staff members."

Page 15, line 21: We suggest the deletion of the word "staff" which seems to be a typo in this line.

Page 17, line 14: We would suggest this phrase be added "and the Youth Camp Advisory Council"

Page 20, line 17: The civil penalty under this Act is much more severe than that of HR1326 but it would seem more appropriate to have a lesser penalty.

Page 22, line 14: Suggest the deletion of the word "campers." There is no reason to excite or alarm children concerning conditions in camp if the owners and directors, parents and other personnel are alerted to the danger. Younger children could become seriously disturbed or upset by such notification.

Page 23, line 3: We would suggest the addition at the end of the sentence: "are maintained but the terms of such exemption shall require appropriate notice thereof to parents or other relatives of affected campers at least annually." We also suggest the addition of the following sentence to section 14: "Nothing in this section shall serve as a permit to operate a substandard camp."

Page 26, line 8: We suggest the addition of these words at the end of section 19: "At the end of which time there should be a review by Congress as to future needs."

CRITIQUE - S. 2907 - THE YOUTH CAMP SAFETY AND HEALTH ACT OF 1978

by American Camping Association, Inc.

Section 2 The stated purpose of the Bill is not fulfilled in the text. There is no requirement whatsoever for any State to enact the type of health and safety standards indicated and no guarantee to the public that any State would ever do so should the Bill become law. While Congress may intend to have the States implement and enforce such regulations, there is nothing in the Bill to require such State action, nor any financial incentive for implementation.

The American Camping Association believes in equal protection under law for ALL children attending ALL camps in ALL States, and realizes that statistical data gathered therefrom will finally offer the country the first true, controlled comprehensive data on camp health and safety nationally. In addition, the ACA believes that tne record clearly shows that in the twelve years of Congressional debate on this subject, only thirteen States have shown any inclination to enact comprehensive youth camp health and safety regulations on local levels, leaving campers in numbers of States without such protection. The bill, S.2907, gives no reason to believe that there would be any change in this level of State interest in the subject.

Section 3 Page 2, line 12, delete words DESIGNED TO BE which could be a loophole and is unnecessary in this definition.

Section 4 Page 4 (a) (2), line 7. Insert words "youth camping" between Private and Organizations.

Section 4 Page 5 (b), line 7. This paragraph allows the establishment of regulations with no review of such regulations/standards by the Congress or by interested parties and could lead to the much feared OSHA type of bureaucracy. There is no opportunity for public comment or reaction to be registered with the publishing of "proposed regulations" in the Federal Register with a comment period before final regulations are published.

There are no mandated federal or state youth camp advisory councils as are called for in other variations of youth camp safety legislation. Though paragraph (a) indicates guidelines and standards developed by other states or organizations will be reviewed, there is no guarantee that experts in the camp field or in the implementation of those standards, much less parents of campers (the consuemr) will be consulted. The American Camping Association believes that the establishment of such mandatory councils are absolutely essential to prevent a runaway bureaucracy as well as to provide professional and consumer input to the assigned state or federal regulatory agency.

Section 5 Page 6, (b) lines 14-21. This section on funding to provide incentives to States is a travesty, and insults the purpose of the legislation. It is both new and totally foreign to any prior incentive concepts in the history of this legislation. It must be noted that one of the prime concerns voiced in State legislatures as reasons for not implementing state youth camp safety regulations is lack of funding, and this section offers no such funding. In fact, it is hard to see the purpose of providing up to 50% of additional funds to a State if indeed the necessary original costs for such a program must be furnished totally by each State. We have States today, such as New Jersey, with fine youth camp safety laws on their books, but with limited state funds available for implementation, and who await federal implementation grants...not supplemental funds unnecessary for basic purposes. Other states have rejected the principle of youth camp safety for this very reason. In essence, the Federal government in this clause, offers NOTHING by way of incentive to a State. Coupled with the meager total funding, this section would not permit any new States to enter youth camp safety precepts with benefit of Federal funds as per other samples of this legislation. At the same time, it misleads the public into thinking that the Federal government is indeed promoting

the principle of youth camp safety via incentive programs and such is not the case herein.

Section 6. Page 6 (a). This is one of the most misleading concepts in S.2907, for it purports to provide incentives for youth camps and states to partake in a volunteer youth camp safety program under and as yet undefined federal criteria, permitting camps in participating States to advertise the fact that they comply as a presumed boon to public acceptance. The American Camping Association submits that this is not at all acceptable because:

1. Facts show few states are interested in complying in such voluntary programs, leaving campers in other states unprotected and parents little way in knowing the differences. It is not realistic to believe that the public will be aware of such a "federal seal of approval" when such has not been the situation in any other public or private camping effort in a century of youth camping in the nation.

2. There is an implied warranty to the public, having a reliance on such a "seal of approval" when in reality all that is being covered is minimal health and safety with no concern to other areas of quality control that professionals in the field deem necessary for good camping practices. Standards of the American Camping Association and other youth serving organizations, for example, go far beyond such minimal standards, and the public has no way to differentiate on the surface of such an approval seal. Part (4) of this section, coupled with the penalty clauses in Section 8, offer the only teeth or enforcement penalties in the entire bill, and are punitive in nature.

3. We submit that all other examples of youth camp safety legislation are educational concepts designed to upgrade substandard camps with penalties restricted to willful violations of health or safety critera, not to misuse of a seal of approval.

4. We must refer again to the permissive state compliance factor as relates to the proposed "advertising." It is obvious that a good, well-run camp could operate and far exceed any proposed Federal regulations but be located in a state that is not participating in the program. Such a fine camp has a slur placed upon it by being denied use of the proposed Federal seal of approval when, indeed, it meets all requirements. It is the State that does not comply. This could be harmful to a camp's reputation and unfair to good and "innocent" camps.

   Non-profit camps in non-participating states run the risk of being deemed not in full compliance of all applicable federal laws required to take part in other Federal programs, such as Title XX funding, food commodity distributions, summer feeding and special milk programs, etc., through no fault of their own. This could be most harmful to the non-profit sector.

5. Paragraph (5) refers to question of reports and records. Again there is no control factor to the bureaucracy on State or Federal levels, and no controls to evaluate the programs in operation. ACA believes that reports should be standardized to provide accurate camping health and safety data and tied to sunset provisions to terminate the program after a specific number of years of operation if, indeed, no need is shown to continue such a program. In the interest of good government and in the interest of the American taxpayer, we believe that all such programs should be periodically reviewed and their need for continuation be evaluated.

Section 8. Page 8. This has been referred to above. This is the prime incentive or enforcement segment from the viewpoint of the camp operator and is meaningless. There is no public education as to what the advertising of approval represents; there are few states indicating any interest and nothing to warrant any camp even caring if they have the right to use such a government seal or not. Camps in the 13 states now with such a program already are licensed and the license testifies to such compliance. Who needs anything else? Camps professionally accredited by this Association already may display the membership emblem-logo, which already enjoys a national public recognition, so this does very little and provides no incentive for improving the level of health and safety in the nation's youth camps. It is totally without educational or redeeming value.

COMMENTS:

The American Camping Association finds this Bill to be inadequate to complete its states purpose and detrimental to the public and professional interests of the organized youth camping movement in the nation.

The American Camping Association cannot support S.2907 and with respect calls attention to the oral testimony on the concept of this Bill before the Senate's Subcommittee on Children and Human Development on March 21, 1978. While some language has been changed, S.2907 is the same as the legislation offered former Senator Taft in 1974. The American Camping Association respectfully urges the Subcommittee to adopt the language of HR.6761 as now in the U. S. House of Representatives as the best available Bill on youth camp safety, and which is in reasonably close accord to S.258 offered by Senator Ribicoff. We totally reject and urge the Committee to vote down S.2907 as being a disservice to the camping industry in the United States and to the American public and to parents sending children to camp.

Respectfully submitted,

Alan J. Stolz
Legislation Chairperson

Armand B. Ball, Jr.
Executive Vice President

Senator CRANSTON. Mr. Buttrum, you may proceed.

Mr. BUTTRAM. My name is Jack Buttram and I am appearing on behalf of Dr. Ken Hay. Dr. Hay regrets he cannot be here. He was unable to change his speaking schedule at the last minute.

I am accompanied—today—by Reverend Richard Grammer, of Glen Burnie, Md., who is a member of the Youth Camp Safety Committee.

I will summarize Dr. Hay's statement for you. We worked on it together and I am prepared to answer questions.

The interesting thing about youth camp safety, which we see every day in our work, is that the case for legislation has not been made. We believe that proponents of the law should have to make the case for it before it is enacted.

We appreciate your attitude, Mr. Chairman, and your opening remarks and fairness in looking at it. We feel there has been an approach from the legislative standpoint heretofore that demonstrated a rather one-sided view of advocating the legislation. We appreciate the openminded way in which you approach the problem.

Senator CRANSTON. Thank you very much.

Mr. BUTTRAM. Yes, sir.

In our camp in North Carolina we have 11 weeks of summer camp, 24 weeks of school camp. We run all kinds of conferences and many other full-time, year-round operations. This is just to say that our operation is not another bunch of kids going to camp for a week. We look at our camps in general as an extension of our ministry and, therefore, we view them as an exercise of our faith in practice.

In fact, one of the difficulties that many of our camps have with ACA accreditation, is that some of the ACA standards move into humanistic areas of program and we feel it is not proper to submit our ministry to someone else's jurisdiction and judgment.

We would like to point out some facts, then put them in perspective. We believe, the facts do not indicate a need for the Youth Camp Safety Act at this time.

I take my first example from the Boy Scouts' testimony in the House last spring in which the national statistics for 1973 show that they had three deaths, one from drowning, one from lightning, and one from heatstroke. Those hardly seem to be areas in which you would be able to legislate effectively.

Now, if you take the same group of teens and project them on a national statistical basis, you would expect approximately 50 deaths from that age group in 1 year. The fact that the Boy Scouts had only three in that year, I think, speaks well for them. The following year they had two. One from a ruptured aorta and one from an automobile/pedestrian accident. In 1971 they had one from drowning. In 1976 they had one from internal bleeding.

That hardly seems to present a case for national legislation.

An HEW survey in 1975, in which the Federal Government surveyed Washington State, Pennsylvania and Florida, uncovered only two deaths. One in Washington State from drowning, one auto/pedestrian accident in Pennsylvania, and not one death in Florida.

There were 430 camps participating in that 3-year Government survey, and again, you would forecast about 20 deaths out of a comparable age group. They had only two.

Incidentally, our statement should be typographically corrected on page 5 to be 10 times safer rather than 100.

In North Carolina, the State in which we operate, to put some facts in perspective, we have had seven deaths related to camping in an 11-year period. That is a yearly average of 0.63. We estimate that we have about 1,500 camps in North Carolina.

One of those cases you will be hearing about a little bit later on today was a 10-year-old boy who went into a coma after being underwater in a university-owned swimming pool. Nineteen months later he died.

That is certainly a tragic accident and we have no defense for it. But to use that accident in an indoor swimming pool, in a university situation, to try to pass the Youth Camp Safety Act in North Caroline, as they attempted to do last year—and if you are interested in knowing the legislative point at issue in North Carolina, we could respond to that—we think that is no more camping than Vince Lombardi was a camp director when he took the Redskins to training camp each spring.

Finally, to conclude with our own personal experience, Dr. Hay has been a camp director for 22 years. I have been a camp staffer for much the same period of time. He has operated in five States, two continents, and we have yet to see a near fatal accident. At the Wilds, we had about 4,200 campers last year in our summer camp and we had only 17 injuries that were serious enough to see a doctor about, and most of those visits were for X-rays just to make sure that nothing was wrong. The most serious accident was a hairline fracture of the ankle, and that came from jumping off a step. I do not know how you could legislate against that.

In summary, we say that our camps have not heretofore been listened to. Our camps are not part of the American Camping Association nor are they represented by the religious groups that were cited.

This independence is by choice, because we feel the rsponsibility for our own ministries cannot be turned over to either ecclesiastical or bureaucratic administration. The responsibility must remain with us.

We appreciate the opportunity to testify and to respond to any of your questions.

[The prepared statement of Dr. Hay follows:]

32-168 O - 78 - 6

STATEMENT REGARDING S-258

BY DR. KEN HAY, DIRECTOR OF THE WILDS CHRISTIAN CAMP AND CONFERENCE CENTER, ROSMAN, NORTH CAROLINA

BEFORE THE SENATE SUBCOMMITTEE ON CHILD AND HUMAN DEVELOPMENT OF THE SENATE COMMITTEE ON HUMAN RESOURCES

March 21, 1978

Mr. Chairman, Senator Hayakawa, Senator Riegle:

I appreciate the opportunity to appear before this distinguished committee in regard to the penuing legislation called the Children and Youth Camp Safety Act (S-258).

Camp safety is a fact that I meet and deal with in my work every day. At our camp in North Carolina, we have an eleven-week summer season of camping, plus staff training weeks, twenty-four weeks of school camping in the spring and fall, numerous week-end retreats, winter camps, camp directors conferences, youth leaders conferences, family and singles conferences, and several wilderness and other specialized camps.

I note all of this, Mr. Chairman, to say that ours is not simply a few kids going to camp in the summer for a week; and ours is not the only kind of camp or conference center engages in this kind of activity. We believe we are engaged in a ministry that extends far beyond providing recreational activity in the out-of-doors. It is a ministry of spiritual, moral, and ethical training. For us, and the people we represent, this is a matter of carrying out our faith in practice.

This means, then, that while the United States Government may look at our camps just as another area of regulation, we look at it from quite another standpoint. Many of our people are likely to become quite upset and emotional when the Government begins again to--I hope you will forgive the language; I mean no disrespect--"stick its nose in our business."

Mr. Chairman, I believe our people--and incidentally I appear also today in the informal role as a spokesman for the Youth Camp Safety Committee, which is a more or less ad hoc group of several dozen of us have organized to pool our understanding of this legislation--our people do not resent or grow emotional about legitimate regulation. So far as I know, there has been no revolt against getting driver licenses or having motor vehicles inspected. In fact, as I pointed out to the House Committee last year, we are regulated at present by twenty-four (24) local, state, and federal agencies already, as well as insurance regulations. The paperwork and overlap burden becomes onerous at time, but we recognize that much of this is in the public interest.

What we do object to, Mr. Chairman, is still another and more expensive layer of regulation that so far as we can tell will do absolutely nothing to increase safety, and will--we firmly believe--carry the potential of crippling our ministry. We not only feel strongly about this, but we believe the right of citizens to petition

their government for anything and everything, we are simply asking to be left alone.

Mr. Chairman, we believe the burden of proof that such legislation as the Youth Camp Safety Act is needed should rest with the proponents. In the several years we have been following this bill, and in the study we have given to it, we cannot find that a convincing case has been made, or, indeed, can be made.

Therefore, we would like to talk about facts.

We are well aware of the voluminous newspaper material presented in the past to the Congress and the public of the individual cases of death and injury in camp or so-called camping environments. However, we submit that no one has yet gathered this data into a comprehensive case for passing the legislation. Certainly the individual cases are tragic; they not only deserve sympathy, they deserve correction. But these cases are spread out over more than a decade. They are mostly isolated, one-of-a-kind incidents, no less regrettable for that, but still not indicative of a national need for legislation.

To support our position that no clear case for lesislation has been demonstrated, we wish to cite the following facts:

1. The Boy Scouts of America, in the last year complete nationwide statistics were available (1973), said they had 729,000 boy weeks of camp with three fatalities. Of these, one was for drowning, one for lightning, and one for heatstroke. I think you will have to agree with me that

lightning, at least, is not preventable--and probably heatstroke. In any case, to convert this into some kind of comparable statistic, I have used the method used by the House Subcommittee in their hearings, and also the HEW figures, and tried to come up with a comparable incidence of fatal accidents in percentage per thousand teen-agers per year.

The national statistic as published in the Statistical Abstract of the United States (1972, 97th Edition, table 88 pg. 62) says ages 5-14 death rate per 1,000 population is 0.4. So for a population of 10,000 teen-agers, a statistically normal incidence would foresee 40 deaths.

Therefore, for this camper population of 729,000 boy weeks, we have 4.6 million camper days or 12,477 camper years. Statistically, one would expect a normal incidence of death of 50 individuals. The fact that they had only three (and this was a bad year for the Boy Scouts) speaks very well indeed. (HOUSE HEARINGS YCSA pg. 100 ff)

In 1974, the Boy Scouts had two deaths--one a ruptured aorta, another an auto/pedestrian accident; in 1975 one drowning; in 1976 one from internal bleeding as a result of a fall.

Mr. Chairman, I am not trying to make the case for the Boy Scouts; but these facts hardly seem to be crying out for national legislation.

2. Let us take another case--the matter of a special three-state survey done by the Department of HEW in 1975.

According to HEW witnesses before the House Subcommittee holding hearings on a similar bill last year, they surveyed three states--Pennsylvania, Florida, and Washington.

The facts are from that survey that there was one drowning in Washington, one auto/pedestrian accident in Pennsylvania, and not one death in Florida.

Again, making a statistical comparison: the incidence of fatalities from all sources of the camping population was as follows--1,836,822 camper days, or 5,032 camper years, from which we might expect slightly over twenty (20) fatalities if the standard death rate of 0.4 per thousand is used. The death rate for campers in these three states turns out to be 0.039 or almost 100 times less than the general population.

Florida wished to participate and gather statistics for the following year also; and they had three deaths the following year--one from drowning, one from snake bite (in which the victim, although quickly treated, was allergic to the anti-venom), and one from a camper releasing gas into a plastic bag and then putting his head in the bag.

Tragic as these facts are, they are nevertheless approaching the irreducible minimum so far as eliminating accidents. I suggest that the passage of the bill under consideration and the expenditure of the $7.5 million authorized for the first year is not going to eliminate snakebite, lighning, or other genuine accidents.

3. To take our own state of North Carolina, the best estimates are that 1500 camps operate in the state. As a matter of record--a fact--there have been but seven (7) deaths in North Carolina due to camp related accidents in the last eleven years. This is a death rate of 0.636 per year. I have taken the camper day averages from the HEW survey and transferred it to North Carolina, and it comes out to slightly over 5,000 camper days per camp per year. This would make a total of 7.9 million camper days or 21,841 camper years. According to the national statistical average, we could expect 87 deaths per year from this population. In fact, we have less than one. Our death rate in North Carolina is, according to this estimate, .0029 per thousand.

Girl Scouts reported in 1976 they had 7300 campers; that's 43,800 camper days. During this season, they had only 36 injuries, and not one was serious enough to be kept overnight in a hospital or infirmary.

Now I am aware of the dangers of statistics, but I am also aware of the fact that we have had only seven camp related deaths in North Carolina in over ten years.

Incidentally, one of those deaths was a young fellow who was injured and subsequently died in an indoor swimming pool accident at a state university during what was called a "basketball camp." Mr. Chairman, as we have repeatedly pointed out, that "camp" was no more a camp in the outdoor

sense of the word than the late Vince Lombardi could have been called a camp director because he took his football players to training camp each year.

We believe that to use "horror" stories like this is to tar and feather camping and does not become the worthy cause the proponents of this legislation espouse.

There are many, many other facts which could be cited, Mr. Chairman, if we had the time. But I would like to conclude with just my own set of facts for this committee's consideration.

In my personal experience as a camp director, which spans 22 years in five different states, and in my consulting experience on two continents and in the Pacific, I have never seen a single near-fatal injury or death. In the years we have been operating the WILDS, we have had 65,000 campers--390,000 camper days. We have 36 weeks of camp a year now and have had campers last summer alone from 21 states and three foreign countries. We employ more than 120 people full time when our camp is operating at capacity and have 20 permanent year-round staff members.

With all this exposure to camping and first-hand knowledge of the facts, frankly, I cannot see a need for this bill.

Last summer, out of a camp population of 4,380 teens--26,280 camper days--we had only 17 injuries that were serious enough to be seen by a doctor; and only one of those

had any major problem. Most were sprains that we had X-rayed to make sure there was no injury. One girl had a slight hairline fracture of the ankle when she jumped off a bottom step onto a road. Mr. Chairman, passing this bill or twenty more like it is not going to prevent that hairline fracture.

On the other hand, because of the alertness of our staff, one girl was advised to have her parents take her to see a doctor. They did, and a tumor was removed in time to prevent any serious problem with a malignancy. The parents expressed their appreciation for our actions; otherwise, they might not have noticed it until it was too late.

Mr. Chairman, I do not have the time nor do you have the patience to allow me to go into other objections we have to this bill, including our objection in the areas of personnel selection, overlapping and wasteful administration, and downright fear at the ineptitude and inappropriateness of the regulation that the Federal Government brings to almost every field in which it enters.

May we simply say we do not think the bill is needed and that until such time as a convincing need is positively demonstrated, we think the Congress, although admittedly well intentioned, would do well to look to other areas for more appropriate safety legislation.

If there is a need shown for this legislation, as we believe the proponents should have the burden of showing,

we will be the first in line to push for it. As a matter of fact, we worked hard last year in North Carolina to get an originally bad bill amended to include areas of waterfront and riflery added to the usual health and safety inspections which we willingly undergo. But we need to firmly note here that until such a national showing is made, we must regard this effort as unwarranted meddling and a totally unnecessary intrusion into the methods, programs, and personnel we wish to utilize in running our camps.

We appreciate your intention and the interest of this committee in this matter. Thank you.

* * *

Senator CRANSTON. Thank you very, very much.

Mr. Graham?

Mr. GRAHAM. Senator Cranston, I have a prepared statement also, but after listening to your remarks and the Department of HEW's testimony, it is obvious to me that you do not need to have points brought up to you more than once.

I would just like to take an opportunity to let you know I am the immediate past president of CAMP, Camping Association for Mutual Progress, and I am here to represent the many camp operators and especially the thousands of parents that send their children to our camps each year.

Of course, we are centered in the Southwest where most of the opposition to a Federal bill has been concentrated since the beginning of proposed Federal legislation years ago. We want you to know that we have interpreted the collected facts to indicate that Federal legislation is not necessary for youth camps because youth camps have a good safety record.

We agree with the HEW study that indicates no legislation is necessary. We agree with Mr. Ouland's review of the insurance company records that indicate children are safer in camp than in school, or in their home, and we agree with the HEW findings that children in youth camps have a much lower accident rate than would normally be expected anywhere else.

We have conducted our own survey of 50 States, 2 years ago, and from the results of that survey, we also find that all States have some legislation already on the books that affect the health standards and safe operation of youth camps, and not one single State indicated that youth camp safety was a problem for them at that time.

Only one State indicated that a Federal law was at all desirable. The summer camp is one of our Nation's most effective institutions, and we have evaluated all the information that has been brought up to indicate that camps are to be congratulated for being able to conduct such highly challenging activities, as horseback riding, skiing, and the like, and still maintain such an excellent safety record.

There are thousands of parents from the Southwest and other areas who are members of various camping organizations, I might add, that have differed with their organization's position and do not feel a Federal department can improve the century-old record of excellence and safety established by our Nation's youth camps.

The Department of HEW has been very helpful to provide guidelines and information for camps over the past years. We congratulate you as legislators for this interest in youth camps.

At the same time, we must make it quite clear that we are firmly opposed to the pending Federal bills as being ineffective, unnecessary and even detrimental to the maintenance of high safety standards in our Nation's youth camps.

Thank you very much for allowing us this opportunity to express our views, and please do not mistake this brief statement for lack of interest or lack of very strong opposition to these bills.

[The prepared statement of Mr. Graham follows:]

STATEMENT TO THE SUB COMMITTEE ON CHILD AND HUMAN DEVELOPMENT OF THE COMMITTEE ON HUMAN RESOURCES.

21 March 1978 Room 4232, Dirkson Senate Office Building Washington, D.C.

Gentlemen, I am the immediate past president of C.A.M.P., Camping Association For Mutual Progress and I am here to represent the many camp operators and especially the thousands of parents of our campers who are opposed to federal legislation of their youth camps. C.A.M.P. is a loose knit organization that has been actively opposed to federal legislation of youth camps since it was first proposed several years ago.

I suppose if this persistent threat of imposing some kind of federal control on youth camps continues we will need to change our name to Camping Association for Mutual PROTECTION.

When federal legislation of youth camps was first proposed about 1972, there were emotional news articles of terrible accidents in camps. Camper parents and camp operators who read these reports felt all camps were indicted on charges of unsafe operation.

Since then, summer camps have been on trial and on each count they have been found not guilty.

1.) The Survey on Youth Camp Safety by the Department of H.E.W. stresses no need for legislation.

2.) A review of insurance company's active in youth camps indicated children are safer in camp than at school or even at home; and further, even that very low accident rate has been steadily decreasing each year.

3.) The government study of camp age children indicated that the death rate in youth camps was 1/100 that which was considered to be normal.

4.) A survey of governments of the 50 states shows

- All 50 have existing state laws that govern the healthful, safe operation of youth camps.
- Not one single state indicated that youth camp safety was a major problem.
- Of 50 states, only 1 (Ohio) felt a federal law was desirable in their state.

If, in our system, a man can not be tried twice for the same offense, how many more times must youth camps prove their case?

Summer camping is one of our nation's most effective educational institutions. Will you please take a moment to try and imagine the magnificent degree of competence and self-imposed controls that must exist in our summer camps to enable so many millions of young children to regularly participate in highly challenging activities like riflery, archery, water skiing, swimming, mountain climbing, or horseback riding and still have so very few accidents.

Do you really think a federal department can improve on the century old record of excellence and safety established by our nation's youth camps?

There are thousands of parents around the nation who do not think so.

The Department of H.E.W. has been very helpful in providing guidelines and information for camps over the past years. We congratulate you as legislators for this interest in youth camps. At the same time, however, we must make it quite clear that we are firmly opposed to the pending federal bills as being ineffective, unnecessary and even detrimental to the maintenance of high safety standards in our nation's youth camps.

Senator CRANSTON. We, of course, know of your interest.

Thank you for your testimony.

I am glad to hear the good work that HEW has been doing.

I have quite a few questions.

My first will be addressed to you, Mr. Stolz, but if any of the others of you wish to comment or disagree, you may.

First, in your written testimony, you indicate that 18 percent of the camps visited or revisited by the American Camping Association last year did not meet the association's standard.

How many camps did the association visit in that period?

Mr. STOLZ. I will let Mr. Ball respond to the question.

Mr. BALL. Between 600 and 700 camps are visited normally.

Senator CRANSTON. How frequently does ACA reinspect camps?

Mr. BALL. Anywhere from 3 to 5 years.

If the camp changes operation, the operators, directors, a visitation is immediately planned for next summer, and we just recently enacted a plan to visit all our member camps every 3 years.

Senator CRANSTON. Do you know what percentage of camps approved by ACA are subsequently disapproved for some reason?

Mr. BALL. I am not sure I understand the question. Do you mean "Approved" at one time and then disapproved on a subsequent visit?

Senator CRANSTON. Yes.

What are the figures on that?

Mr. BALL. I am sorry, I do not have that.

Senator CRANSTON. Could you give us that for the record?

Mr. BALL. Yes.

[The information referred to follows:]

In reviewing the camps listed by ACA over the years 1974–1978, 5% were changed from an Accredited status to Provisional due to the standards visitation.

Senator CRANSTON. Do you have a breakdown which you could supply to the subcommittee, for the hearing records, on the specific areas, such as the waterfront, where camps fail to meet the ACA standards?

Mr. BALL. We can provide that.

[The following information was subsequently received for the record:]

The 12 most frequently missed Standards in the years 1974-1976 were:

1. C-4-----Has the camp director attended annually at least two meetings of ACA on a District, Section, Regional or National level?
2. C-14----Does the camp have a written policy prohibiting gratuities to personnel?
3. B-38----Does the camp have a written search and rescue procedure for persons lost, missing, or runaway?
4. H-4-----Has the camp safety procedures specific to the activity, including:
   a. Written safety regulations which are made known to campers;
   b. A ratio of adult leadership to participating campers in relation to the degree of risk; and
   c. First aid supplies and equipment prepared by the appropriate person to meet the potential emergencies related to the particular activity?
5. A-3-----Is there a written plan for environmental quality control of resources on the site?
6. B-61----Does the camp have written safety procedures for all vehicles used for transportation of campers and staff, including:
   a. Safety Education;
   b. Safe Seating;
   c. Highway Stops;
   d. Relief Drivers when pertinent; and
   e. Supervision.
7. B-36----Are all staff members furnished written health and accident emergency procedures which are approved by both camp physician and legal counsel and given training in their use?

8. B-37----Are all staff members provided written disaster procedures which are practiced?

9. D-16----Does the camp have a written outline describing how specific objectives for camper development are implemented?

10. B-52----Does the camp have a written policy covering camper and staff possession and use of special personal equipment, such as sports and hunting equipment, vehicles, appliances, muscial instruments, aquatic equipment, and possession of pets?

11. H-1-----Has the camp written operating procedures and regulations regarding the activity?

12. A-4-----Is there a written plan regarding risks to humans from both natural and man-made site hazards that is implemented through the following:

    a. Identification of risks;

    b. Establishment of regulations;

    c. Provision of protective devices; and

    d. Elimination of hazards where feasible?

Senator CRANSTON. What information with respect to camp safety does ACA require member camps to provide to parents of prospective campers?

Mr. STOLZ. The fact that the camp is accredited means that it has complied with 14 mandatory standards. No deviation is made.

The camp has an overall score of 80 percent in the remaining areas that we seek. The fact that they—the camp—have the use of the ACA accreditation emblem tells the parents that.

Senator CRANSTON. You do not require any specific notification?

They can just advertise if they have been approved?

Mr. STOLZ. They may use the ACA logo on their stationery.

Senator CRANSTON. I would assume that the cost to a camp of complying with Government regulations is generally passed on by the camp in the form of higher camping costs. Are camps in States which have State laws with respect to youth camp safety hindered in their ability to compete for campers with camps in States without such laws?

Mr. STOLZ. I do not think that question has even been a factor. My own State of New Hampshire rates a camp from one to five categories and there is an annual inspection by the Department of Health, plus other departments, for boating, motor vehicles, fire, medical personnel, et cetera.

We can consider it a plus factor, and support the effort.

Senator CRANSTON. Do the others of you have any comments on that?

Is there any competition price?

Mr. GRAHAM. That is a very new subject that has been brought up and there has been little experience to determine how the State law that has already been enacted will affect tuitions and costs.

I think significantly there would be very little effect.

Mr. STOLZ. For example, the New Hampshire State annual license fee is still $20 a year.

Senator CRANSTON. Is there any indication that the parents are not willing to pay more for safe camps?

Reverend GRAMMER. Senator, one of our large drawing points——

Senator CRANSTON. Would you give your name for the record.

Reverend GRAMMER. Richard Grammer.

One of the large drawing points for our camp is the low cost and one of the things that we are looking apprehensively at is the possibility of the increased red tape with respect to bookkeeping, reporting. Since most of our labor is volunteer, it would raise our costs significantly, to provide the paid help to do these things—the cost is of concern to us.

Senator CRANSTON. Mr. Stolz, on page 5 of your written testimony, you indicate that 13 States now have meaningful health and safety regulations.

Do you know what percentage of the Nation's camps and campers are located in those States?

Could you give us that for the record, if you do not know?

Mr. STOLZ. I think we can give that for the record.

And I think that ACA statement is accurate.

Senator CRANSTON. Can you give us what you can for the record?

Mr. STOLZ. Surely.

We estimate that 4,937 of the 10,500 camps in the United States are located in the 13 States mentioned, or 47 percent of the total camps.

Senator CRANSTON. How do those States' regulations compare to the ACA standards?

Mr. STOLZ. Very comparable.

That is where most of the State regulations came from. As a matter of fact, in the State of Michigan, where your colleague Senator Riegle is from, those particular regulations were authored as a doctorate thesis by a former national ACA president.

Senator CRANSTON. How do ACA standards compare to HEW's minimum standards?

Mr. BALL. Basically, the standards individually are higher but you must recognize that proposed regulations such as in the HEW model booklet may have to be met completely, whereas only 80 percent of ACA standards are complied with for accreditation. Also, ACA standards are concerned with more than just basic health and safety, so that is a little difficult.

Senator CRANSTON. You indicated on page 5 of your written testimony, Mr. Stolz, that Massachusetts is one of the 13 States which had meaningful regulations, but then you indicate that the Massachusetts legislature just rejected a youth camp health and safety act.

Can you explain that?

Mr. STOLZ. Yes, thank you for correcting that.

It should be Mississippi which has the regulation which was just updated.

The Massachusetts Commonwealth has rejected, as late as 2 weeks ago, another attempt to enact such State legislation.

Senator CRANSTON. You mentioned that in the last 2 years, camp health and safety acts were proposed and rejected in North Carolina, Maryland, and Rhode Island, as well as Massachusetts.

Do you have any views on why these States rejected the proposed legislation?

Mr. STOLZ. I am afraid that would just be conjecture, other than a potential for lack of funding.

Senator CRANSTON. Do you have a comment?

Mr. BUTTRAM. Yes, sir.

In North Carolina, when the bill was originally written, it would have required a license for any group of children away from home for parts of 2 days or more. Any 5 children under 18 would have had to apply for a license 90 days in advance and pay up to $50 in license fees. They would have been subject to fines of $500 per day for unknowing violations and $700 per day for knowing violations. This was applied to Boy Scouts, Sunday School groups, and all the rest.

It was a bad bill.

In North Carolina, the ACA local representative who attended the hearings in the State House at Raleigh had to say that ACA was against the bill in that State. So I think it was a matter of good intentions gone awry, even at the State level. This is our great fear in regard to national regulations; that good intentions may end up just creating a Federal monster that we would all have to live with.

Senator CRANSTON. Do you think if that had been a good bill it would have been supported by the camp owners in the States?

Mr. BUTTRAM. Yes, sir. We amended it to the point that it might well have passed the legislature if our amendments had been adopted which were directed at waterfronts, rifle ranges and transportation.

Senator CRANSTON. Could you give us for the record a copy of the bill that you would have supported?

Mr. BUTTRAM. Yes, sir, I will be glad to.

Senator CRANSTON. Mr. Stolz, in your written testimony you made reference to studies following the 1971 HEW report on accidents in youth camps which did not contradict the 1971 reports' conclusions that children in camp were five times safer than they were in school.

Would you supply for the record the names of these studies and copies, if you have them?

Mr. STOLZ. Yes, sir, Senator. These studies are reported in the hearings in 1974 and last spring, in the House of Representatives, under the chairmanships of Representatives Daniels—1974—and Gaydos—1977.

We will be happy to submit that.

[The material referred to and subsequently supplied follows:]

YOUTH CAMP SAFETY COMMITTEE
1629 K Street, N.W.
Washington, DC 20006

April 12, 1978

The Honorable Alan Cranston, Chairman
Subcommittee on Child and Human Development
Committee on Human Resources
United States Senate
Washington, DC 20510

Dear Senator Cranston:

We appreciated the opportunity to testify before your committee and present our views on (S-258) the Youth Camp Safety Act.

In response to your inquiry concerning the North Carolina legislative proposal on youth camp safety in 1977, we have checked our files and, unfortunately, are unable to provide a clean copy of the bill as amended and considered by the North Carolina House. However, I am sure it can be made available from the legislative research service at the Raleigh State House.

The points, however, which we believed pertinent to the issue were these:

1. We believe the proper regulation of youth camp safety is at the state rather than the federal level. Some aspects are even better left to the county or municipal jurisdiction. We feel this point is most important.

2. At present we believe all areas of camp safety are covered satisfactorily by local legislation or ordinance with the possible exceptions of:

   a. waterfront/aquatics
   b. rifle and archery ranges
   c. transportation (limited aspects)

3. Upon a factual showing that a continuing pattern of hazardous operations exist in a given operational area that is worthy of legislation (i.e., not a one-time or "act of God" type of accident), we believe the following steps could be taken:

   a. Existing health department inspections, utilizing present personnel (possibly with additional training) should be expanded to cover, as an example, the waterfront area of camp. If it is shown the waterfront presents a significant hazard, the inspection could move to assure competent personnel, adequate lifeguards who are properly

trained, and sufficient lifesaving equipment in good repair.

b. The above mentioned inspection could also include areas of riflery or archery if needed. The inspection would insure that competent personnel with proper training are in charge; the range and materials are of satisfactory and safe design; and proper supervision is present at all times the range is being used. Additionally, a provision could be made to insure proper storage and satisfactory security for the firearms and ammunition if used.

c. Also, the division of motor vehicles could perform such additional safety inspection and operator training as may be required to insure safe operation of vehicles if their safety record is shown to be poor.

These are the areas which proponents of youth camp legislation--particularly Mr. Mitch Kurman--have indicated are their major areas of concern. We have no objection to this kind of legislation on a state level, providing a satisfactory showing of need is made in advance.

Presently, North Carolina has a booklet which gathers the statutes applicable to the operation of youth camps. We are enclosing a copy of this publication. We believe the record shows this is the correct approach rather than create additional levels of bureaucracy and expend huge amounts of tax dollars for little or no result. We think the same result could be insured at a fraction of the cost utilizing these suggestions.

The North Carolina bill proposed a one-year renewable license. Presently, in North Carolina, youth camps are required to get a permit before camp can open. This is accomplished by application and completion of satisfactory inspections. The permit continues in force until revoked. However, the inspections continue to be made each year and even at shorter intervals at the discretion of the local authorities. We find this approach to be also much more satisfactory than the one-year term license. It not only cuts down on paper work but exhibits a better attitude on the part of the government toward the governed.

We continue to believe the primary responsibility for insuring a child goes to a safe camp still belongs to the parent. As camp operators, we are happy to respond to inquiries and invite parents and their youth leaders to visit our camp and participate in our program. We believe this insures a relationship that

could not possibly be achieved by the addition of a few statistics in a promotional brochure. We appreciate the good intentions of those who desire to "protect" the public, but we believe creation of such requirements would simply add regulation without actually contributing anything to safety or protection. It is, we believe, another case in which government should not attempt to "help" us. Efforts in this line are necessarily destined to be very expensive and very ineffective.

Thank you for your interest and consideration.

Sincerely,

Jack E. Buttram
Executive Director

JEB:cd

RULES AND REGULATIONS

GOVERNING THE SANITATION

OF

SUMMER CAMPS

PREPARED BY

N. C. STATE BOARD OF HEALTH

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Rules And Regulations Defining Summer Camps, State Board Of Health, Sanitarian, Person, Potentially Hazardous Food, And Sanitize; Providing For The Approval Of Plans; Providing For The Inspection, Grading And Placarding Of Summer Camps; And Providing For The Enforcement Of These Rules And Regulations;

For the purpose of carrying out the provisions of Article 5 of Chapter 72 of the General Statutes of North Carolina, the North Carolina State Board of Health hereby adopts the following rules and regulations governing the sanitation of summer camps:

SECTION 1. **Definitions.** The following definitions shall apply in the interpretation and enforcement of these regulations;

A. Summer Camp. The term "summer camp" shall include those camp establishments which provide food or lodging accommodations for groups of children or adults engaged in organized recreational or educational programs.

NOTES:

1. This definition includes day camps and church assemblies and retreats.
2. This definition and the following sections of these rules and regulations shall not be interpreted as prohibiting summer camps or other organizations from conducting overnight hikes or similar primitive camping activities. However, camp management and group leaders are responsible for the maintenance of accepted field sanitation standards.
3. This definition and the following sections of these rules and regulations shall not be interpreted as prohibiting family camp-outs, scout hikes, and camper rallies.

B. State Board of Health. The term "State Board of Health" shall mean the State Health Director or his authorized representatives.

C. Sanitarian. The term "sanitarian" shall mean a qualified person authorized to represent the State Board of Health in making inspections and posting grade cards pursuant to State laws and regulations.

D. Person. The word "person" shall mean an individual, firm, association, organization, partnership, business trust, corporation, or company.

E. Potentially Hazardous Food. The term "potentially hazardous food" shall mean any perishable food which consists

in whole or in part of milk or milk products, eggs, meat, poultry, fish, shellfish, or other ingredients capable of supporting rapid and progressive growth of infectious or toxigenic microorganisms.

F. Sanitize. The term "sanitize" shall mean effective bactericidal treatment of clean surfaces of equipment and utensils by a process* which has been approved by the State Board of Health as being effective in destroying microorganisms, including pathogens.

SECTION 2. **Investigation of Proposed Camp Sites.** The sponsor of a proposed site should make an advance appointment with a sanitarian from the health department of the county in which the site is located for a joint visit to the site by representatives of the sponsor and the health department. During the site visit, the sponsor's preliminary plans for development of needed structures and facilities will be evaluated, including water supply, sewage disposal, swimming facilities, solid waste disposal, and insect and rodent control. If it is determined that the proposed site and facilities, if properly developed and operated, will comply with these rules and regulations, the sponsor should proceed to develop final plans and specifications.

Approval of Plans. Plans and specifications for camp buildings and equipment, water supply system, sewerage system, and swimming pool or other swimming facility shall be submitted in duplicate to the health department of the county in which the site is located. Construction shall not be started until the plans and specifications have been approved by the local health department.

SECTION 3. **Permits.** No person shall operate a summer camp within the State of North Carolina who does not possess an unrevoked permit from the State Board of Health. No permit to operate shall be issued until an inspection by a sanitarian shows that the establishment complies with these rules and regulations. Permits issued to one person are not transferable to others.

NOTE: If camp food service is provided by a caterer, the over-all responsibility for food service sanitation remains with the camp management.

Violation of any of these rules and regulations shall be sufficient cause for revoking the permit. Receipt of a sanitation rating of less than 70%, or Grade C, shall make revocation of permit mandatory. No permit to operate shall be reissued until the summer camp has been re-inspected by a sanitarian and found to comply with these rules and regulations.

*For approved methods of bactericidal treatment, see Item 13 of Section 6 of the N. C. State Board of Health Rules and Regulations Governing the Sanitation of Restaurants and Other Foodhandling Establishments.

SECTION 4. **Inspection and Public Display of Grade Card.** Inspections of summer camps shall be made in accordance with these rules and regulations at least once during each season's operation. Upon completion of an inspection, the sanitarian shall issue a grade card and it shall be the duty of the management or person in charge to remove the existing grade card and immediately post the new grade card in a conspicuous place, designated by the sanitarian, where it may be readily observed by the public. This grade card shall be kept posted at all times.

SECTION 5. **Re-inspections.** Upon receipt of a request from the management for a re-inspection for the purpose of raising the posted grade, the sanitarian shall make an unannounced inspection after the lapse of a reasonable period of time.

SECTION 6. **Publishing Grades.** At least once annually, or whenever a survey of summer camps has been completed, the grades should be published.

SECTION 7. **Grading.** The sanitation grading of all summer camps shall be based on a system of scoring wherein all summer camps receiving a score of at least 90% shall be awarded Grade A; all summer camps receiving a score of at least 80% and less than 90% shall be awarded Grade B; all summer camps receiving a score of at least 70% and less than 80% shall be awarded Grade C; and no summer camp receiving a score of less than 70%, or Grade C, shall operate.

The scoring and grading of summer camps shall be based upon the following standards of construction and operation, Items 1 through 13 inclusive, and in accordance with inspection form No. 435 (Rev. 1971), which is attached and made a part of these regulations.

ITEM 1. **Site.** The topography, drainage and other site factors shall be satisfactory for the camp facilities and activities, and the site shall be relatively free of actual or potential health hazards.

ITEM 2. **Water Supply.** The water supply shall be from an approved source, shall be adequate to meet the requirements of the camp, and shall be of a safe sanitary quality.

When a private water supply is used, it shall be located, constructed, maintained, and operated in accordance with the requirements of the State Board of Health bulletin No. 476 (Revised 1/70) entitled "Protection of Private Water Supplies." A sample of water shall be collected by the sanitarian and submitted to the Laboratory Division of the State Board of Health or other approved laboratory at least once a year. No backflow connections or cross-connections with an unapproved water supply shall exist.

Adequate hot water heating facilities shall be provided. Hot and cold water under pressure shall be easily accessible to all rooms where food is processed or handled; rooms in which utensils or equipment are washed; baths; laundry rooms; toilet rooms; garbage can wash areas; and other areas in which water is required for cleaning, sanitizing, or other essential operations.

NOTE: It is recommended that a sample be taken while the camp is being made ready for the season, preferably about two weeks prior to opening date, and that at least one additional sample shall be taken while the camp is in operation.

ITEM 3. **Recreation Waters.**

a. **Natural.** A natural or artificial body of water used for recreational purposes may be accepted by the State Board of Health for the declared intended purposes, based upon the results of inspections, bacteriological examinations of the water, and sanitary surveys. It is recommended that samples be taken for bacterial examination once a month during the camping season.

b. **Artificial.** New swimming pools shall be designed, constructed, operated, and maintained in accordance with the recommendations in the State Board of Health bulletin entitled "Swimming Pool Standards," and shall comply with rules and regulations of the local board of health; provided, that pools in existence at the time of adoption of these rules and regulations shall be brought into compliance at such time as major renovations or repairs are necessary; in the meantime, these pools may be used if closely supervised by the camp management and operated in accordance with procedures acceptable to the State Board of Health.

c. **Bathhouses.** Bathhouses, when provided, shall be of sound construction and shall be kept clean and in good repair.

ITEM 4. **Liquid Wastes.** All sewage and other liquid wastes shall be disposed of in a public or community sewer system or, in the absence of a public or community sewer system, by a method approved by the State Board of Health. Camp sewerage facilities shall be properly operated and maintained.

ITEM 5. **Toilet, Handwashing, Laundry, and Bathing Facilities.** All summer camps shall be provided with toilet, handwashing, and bathing facilities which are adequate, conveniently located and readily accessible. These facilities, and laundry facilities when provided, shall comply with Volume II, Plumbing, of the N. C. State Building Code, and shall be kept clean and in good repair. Bathing facilities shall have conveniently located toilet facilities.

a. **Water Closets.** A sufficient number of water closets or approved privies shall be provided in convenient locations to serve the several areas of the camp. Fixture requirements will vary somewhat, depending upon the type of camp, its layout and the composition of the camp population. A widely-used standard calls for:

Resident and Family—one seat for each ten persons except that, in all male camps with urinals, there should be one seat for each 15 persons and one urinal for every 30 persons.

Day Camps—one seat is recommended for every 20 occupants except that, in all male camps with urinals, there should be one seat and one urinal for every 30 occupants.

b. **Lavatories.** Adequate lavatories supplied with hot and cold running water through mixing faucets shall be provided and located convenient to all flush toilet facilities. At least one lavatory shall be provided with soap and towels in the kitchen and any other food preparation areas.

c. **Bathing Facilities.** Bathing facilities shall be provided and located convenient to sleeping quarters.

d. **Laundry Facilities.** Laundry facilities, if provided, shall be kept clean and in good repair.

ITEM 6. **Drinking Water Facilities.** Drinking water facilities shall be provided so that water can be dispensed in a sanitary manner. Drinking fountains, if provided, shall be of sanitary angle-jet design, shall be kept clean and shall be properly regulated.

ITEM 7. **Lodging Facilities.** Sleeping quarters may be of various types depending upon the nature of the camp program or the state of developement of the physical plant, including dormitory-type buildings, rustic cabins, tents on platforms, "covered wagons," etc. Permanent dormitory-type sleeping quarters should provide cross ventilation, at least 30 inches between beds, 40 square feet per person, a minimum of 6 feet between heads of sleepers and an adequate number of sleeping units. Lodging facilities, whether provided by the camp or by individual campers, shall be kept clean and in good repair. Clean linen and soiled linen shall be stored and handled separately and in a sanitary manner.

ITEM 8a. **Food Service Facilities.** Food service facilities shall include a kitchen of adequate size and of completely-enclosed, permanent construction, and a dining hall providing reasonable protection from the elements.

ITEM 8b. **Food Service Utensils and Equipment.** All equipment and utensils shall be so designed and of such material and workmanship as to be smooth, easily cleanable and durable, and shall be kept clean and in good repair; and the food-contact

surfaces of such equipment and utensils, shall, in addition, be easily accessible for cleaning, non-toxic, corrosion-resistant, relatively nonabsorbent, and free of open crevices; provided, that hard maple or equivalent may be used for bakers' tables and cutting blocks and boards.

All multi-use eating and drinking utensils shall be thoroughly cleaned and sanitized after each usage.

All kitchenware and food-contact surfaces of equipment, exclusive of cooking surfaces of equipment, used in the preparation or serving of food or drink, and all food storage utensils, shall be thoroughly cleaned after each use. Cooking surfaces of equipment shall be cleaned at least once each day. All utensils and food-contact surfaces of equipment used in the preparation, service, display, or storage of potentially hazardous foods shall be cleaned and sanitized prior to each use. Non-food-contact surfaces of equipment shall be cleaned at such intervals as to keep them in a clean and sanitary condition.

Necessary facilities shall be provided and used for the cleaning and sanitizing of utensils and equipment. All such utensils and equipment shall then be stored so as to drain dry, and be protected from splash, dust or contamination. In-place cleaning of fixed equipment shall be acceptable when found effective.

All single service articles shall be stored, handled, and dispensed in a sanitary manner, and shall be used only once.

All cloths used by chefs and other employees in the kitchen shall be clean.

INTERPRETATION:

1. Food Service equipment meeting National Sanitation Foundation Standards or equal complies with the design and construction requirements of this item. All equipment should be so installed and located as to permit easy access for cleaning.

2. Facilities and methods for the cleaning and sanitizing of utensils and equipment shall comply with Item 13 of Section 6 of the N. C. State Board of Health Rules and Regulations Governing the Sanitation of Restaurants and Other Foodhandling Establishments.

ITEM 8c. **Food Supplies and Protection.**

(1) **Food Supplies.** All food shall be from approved sources and shall be clean, wholesome, free from spoilage, free from adulteration and misbranding, and safe for human consumption. All meat and meat food products and all poultry and poultry products shall have been inspected for wholesomeness under an official inspection program; and, in all cases, the source shall be identifiable from labeling on carcasses, cuts, unit packages, bulk packages, or from bills of sale.

(2) **Shellfish.** All shellfish and all cooked crustacea meat shall be obtained from sources approved by the State Board of Health; provided, that if the source of clams, oysters, or mussels is outside the State, the shipper's name is on the list of certified shellfish shippers issued by the United States Public Health Service, and; provided, that if the source of cooked crustacea meat is outside the State, the establishment in which the crustacea meat was packed is certified by the regulatory authority of the State or Territory of origin, attested by the presence of an official permit number on the container.

All shucked shellfish and all cooked crustacea meat shall be obtained and stored in the clean single-service shipping containers in which packed at the source. Each unit container shall be clearly identified with the name and address of the packer, repacker, or distributor; the certificate number of the packer or repacker; and the abbreviated name of the State. The re-use of single-service shipping containers and the storage of shucked shellfish in other containers are not permitted.

(3) **Milk Supply.** Only Grade A pasteurized fluid milk and fluid-milk products shall be used or served. Dry milk and milk products may be reconstituted in the summer camp if used for cooking purposes only. All milk and fluid-milk products for drinking purposes shall be served in the individual, original container in which they were packaged at the milk plant or from a bulk milk dispenser which has been approved by the State Board of Health; provided, that cream, whipped cream, or half-and-half may be transferred to individual service units from the original container of not more than one-half gallon capacity or from a dispenser approved for such service. Milk and milk products shall be stored in a sanitary manner and shall be kept refrigerated at 45°F. or less, except when being served. Milk containers shall not be completely submerged in water. Bulk milk dispenser containers, as received from the distributor, shall be properly sealed, labeled with the name and grade of the contents and identity of the distributor, and only the outlet seal shall be broken in the summer camp.

(4) **Food Protection.** All food while being stored, prepared, displayed, and served shall be protected from contamination. All perishable foods shall be stored at such temperatures as will protect against spoilage. All potentially hazardous food shall be maintained at safe temperatures (45°F. or below 140°F. or above) except during necessary periods of preparation and serving. Raw fruits and vegetables shall be washed thoroughly before use. Stuffings, poultry, stuffed meats and poultry, and pork and pork products shall be thoroughly cooked before being served. Salads made of meat, poultry, potatoes, fish, shellfish, or eggs, and other potentially hazardous prepared foods shall be prepared, preferably from chilled products, with a minimum of manual contact, and on surfaces and with utensils which are clean and which, prior to use, have been sanitized. Individual portions of food once served to a person shall not be served again. Conven-

iently located refrigeration facilities, hot food storage and display facilities, and effective insulated facilities, shall be provided as needed to assure the maintenance of all food at required temperatures during storage, preparation, display, and serving. Each cold-storage facility used for the storage of perishable food in a non-frozen state shall be provided with an indicating thermometer of such type and so situated that the thermometer can be easily read.

Containers of food shall be stored above the floor, on clean racks, dollies, slatted shelves, or other clean surfaces in such a manner as to be protected from splash and other contamination.

(5) **Ice Handling.** Ice shall be handled, transported, stored, and dispensed in such a manner as to be protected from contamination. If block ice is used, outer surfaces shall be thoroughly rinsed before crushing. Ice crushers, buckets, containers and scoops shall be kept clean and shall be stored and handled in a sanitary manner. Facilities for the making and storage of ice shall be kept clean and in good repair and shall be so located as to be protected from the elements, splash, drip, dust, vermin, and other contamination, and from use by unauthorized personnel.

ITEM 9. **Construction and Maintenance Requirements.** All camp buildings shall be of sound construction, shall comply with the North Carolina Building and Plumbing Codes, shall be kept clean and in good repair and shall comply with the following specific requirements:

a. **Floors.** All floors shall be of such materials and so constructed as to be easily cleanable, shall be kept free of obstacles to cleaning and shall be kept clean and in good repair. The floor area shall be sufficient to accommodate all necessary operations. Floors in the rooms used for the handling, storage, and preparation of food; rooms in which utensils are washed; walk-in refrigerators; dressing or locker rooms; laundry rooms; and toilet rooms shall be of nonabsorbent materials such as concrete, terrazzo, tile, durable grades of linoleum or plastic, or equal, provided that floors in non-refrigerated dry storage areas need not be nonabsorbent. In all rooms in which water is routinely discharged to the floor, or in which floors are subjected to flooding-type cleaning, floors shall be concrete, terrazzo, tile, or equal, shall slope to drain, and be provided with floor drains.

b. **Walls and Ceilings.** The walls of all rooms shall be kept clean and in good repair. All walls and ceilings in rooms used for the handling, storage and preparation of food; rooms in which utensils or equipment are washed; dressing or locker rooms; toilet rooms and bath rooms shall be easily cleanable and light colored; and walls shall have washable surfaces to the highest level reached by splash or spray in rooms or areas where such occur.

c. **Lighting and Ventilation.** All rooms and areas

shall be well lighted and ventilated, by natural or artificial means, which are effective under actual use conditions. Lighting fixtures and ventilating equipment shall be kept clean and in good repair. Ventilation systems shall comply with the North Carolina Building Code, all applicable State and local fire protection requirements, and vents to the outside air shall discharge in such a manner as not to create a nuisance.

ITEM 10. **Solid Wastes.** All solid wastes containing food scraps and other decomposable material shall, prior to disposal, be kept in leak-proof, nonabsorbent containers such as standard garbage cans, which shall be kept covered with tight-fitting lids when filled or stored, or not in continuous use. Storage racks elevated above the ground are recommended for outside storage of garbage cans.

All dry rubbish (including scrap paper, cardboard, etc.) shall be stored in containers, rooms, or designated areas, in an approved manner.

The rooms, enclosures, designated areas, and containers shall be adequate for the storage of all solid wastes accumulating on the premises. Adequate container cleaning facilities, including a mixing faucet with hose threads, shall be provided and each container, room, or designated area shall be thoroughly cleaned after emptying or removal of wastes.

All solid wastes shall be disposed of with sufficient frequency and in such a manner approved by the State Board of Health.

ITEM 11. **Vermin Control, Premises, Stables.** Effective measures shall be taken to keep flies, rodents, and other vermin out of the food service areas and permanent sleeping quarters, and to prevent their breeding or presence on the premises. Unless flies or other flying insects are absent from the immediate vicinity of the camp, all openings to the outer air of food service areas and sleeping quarters shall be effectively protected against the entrance of such insects by self-closing doors, closed windows, 16-inch mesh or finer screening, controlled air currents, or other effective means.

Only those pesticides which have been properly registered with the U. S. Department of Agriculture and the N. C. Department of Agriculture and approved for the purpose shall be used; such pesticides shall be used in accordance with the directions on the approved labels and shall be so handled and stored as to avoid health hazards.

The premises under control of the management shall be kept neat, clean, and free of litter.

No live birds or animals shall be permitted in the kitchen or dining areas.

Horse stables, if provided, shall be in a location somewhat removed from the main recreation center of activity to minimize

potential odor and nuisance problems. All manure shall be stored removed, or disposed of in such a manner as to minimize the breeding of flies therein.

ITEM 12. **Food Service Employees.**

a. **Food Service Employees.** No person who has a contagious or infectious disease shall be allowed to work in the establishment. It shall be the responsibility of the camp director to require such inspections and tests as often as necessary to safeguard the health of campers and other employees. All employees shall wear clean clothing, and shall keep their hands clean at all times while handling food, drink, utensils, or equipment. Kitchen employees shall not smoke or use tobacco in any form while engaged in foodhandling operations. Kitchen employees shall wear caps, hair nets or head bands in order to prevent hair from getting into the food.

b. **Management.** The management shall provide first aid services and shall arrange and provide medical and nursing supervision of the camping program. Whenever a case of presumably communicable or infectious disease occurs, it shall be the duty of the person in charge to notify the local health department immediately.

ITEM 13. **Miscellaneous.** Potentially hazardous materials, such as fuel, chemicals, explosives, equipment and apparatuses, shall be handled and stored so as to minimize health hazards. Protective railings, fences, etc., shall be provided where necessary and shall be kept in good repair.

SECTION 8. **Staff Members and Campers.** Each applicant for participation in the camping program shall submit evidence of compliance with the following, and such evidence shall be kept on file by the management:

(1) Within six months before admission, every child shall be given a physical examination by a licensed physician. In addition, there shall be a check of the camper's physical condition within two weeks before departure to camp or upon arrival in camp by a licensed physician or a registered nurse.

(2) All employees and campers should give evidence of a successful vaccination against smallpox within ten years af arrival at camp. All employees and campers should give evidence of a basic series of three immunizations of DPT or DT vaccine with a booster dose administered within the past ten years. All campers less than 18 years of age should give evidence of a basic series of three doses of oral polio vaccine with at least one subsequent booster dose.

SECTION 9. **Conflicting and Prior Rules and Regulations Repealed.** All rules and regulations heretofore adopted by the State Board of Health which are in conflict with the provisions

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of these rules and regulations are hereby repealed; and, specifically, the Rules and Regulations Governing the Sanitation of Summer Camps which were adopted at a meeting of the State Board of Health on May 14, 1947, at Virginia Beach, Virginia, and amended at a meeting of the State Board of Health on May 21, 1969 in Pinehurst, North Carolina, are hereby repealed.

SECTION 10. **Severability.** If any provisions of these rules and regulations, or the application thereof to any person of circumstances, is held invalid, the remainder of the rules and regulations, or the application of such provision to other persons or circumstances shall not be affected thereby.

SECTION 11. **Effective Date.** These rules and regulations shall be in full force and effect from and after January 1, 1972.

The foregoing rules and regulations were adopted at a meeting of the State Board of Health on March 11, 1971 at Raleigh, North Carolina, and amended October 28, 1971 at a meeting at Wrightsville Beach, North Carolina.

Certified as a true copy

Jacob Koomen M.D.

State Health Director

Bulletin #460
Revised 3/11/71 & 1/72

NORTH CAROLINA STATE BOARD OF HEALTH
INSPECTION FORM
FOR
SUMMER CAMPS

_____ PERMIT _____ SCORE _____
County or City Health Dept.

_____
Name of Establishment Director Camp Address

_____
Season Opens Season Closes Boys Girls Employees

_____
Present Attendance Maximum Attendance

REMARKS: _____

_____

_____

1. SITE: Satisfactory for facilities and activities; relatively hazard free 20* ..... 20_____
2. WATER SUPPLY: Municipal supply 40*, private supply (construction & operation approved according to bulletin #476, (Revised 1/70) adequate for all requirements 40*, adequate hot water heating facilities 20* ..... 60_____
3. RECREATION WATERS: New pool approved, properly operated; existing pool carefully operated and closely supervised; natural bathing place acceptable 30*, bathhouse, if used, sound construction, in good repair, clean 20# ..... 50_____
4. LIQUID WASTES: Sewage and other liquid wastes disposed of by approved method 50*, on-site disposal system properly operated 20# ..... 70_____
5. TOILET, HANDWASHING, LAUNDRY, AND BATHING FACILITIES: Toilet, handwashing, laundry (when provided) and bathing facilities adequate, convenient, accessible, comply N. C. Building Code, sufficient size 20#, fixtures and furnishings in good repair, clean 20#, approved lavatory with soap and towels in food preparation area, clean 10# ..... 50_____
6. DRINKING WATER FACILITIES: Sanitary drinking water facilities, fountain approved, regulated, clean 20# ..... 20_____
7. LODGING FACILITIES: Furniture, beds, mattresses, mattress covers, draperies, curtains, etc., in good repair, kept clean 30#, linen clean and in good repair, properly stored and handled 20#, soiled linen properly handled and stored 20# ..... 70_____
8. (a) FOOD SERVICE FACILITIES: Kitchen adequate size, completely enclosed, permanent construction, dining hall protected from elements 30# ..... 30_____
8. (b) EQUIPMENT AND UTENSILS: Smooth, easily cleanable, in good repair, clean 10#; food contact surfaces accessible, non-toxic, corrosion resistant, smooth 10*; multi-use eating and drinking utensils clean and sanitized after each usage 60†; cooking utensils and food contact surfaces of equipment and storage utensils cleaned after each use 10#; cooking surfaces cleaned each day 10*; utensils, etc., used for hazardous foods cleaned and sanitized before each use 20*; non-food contact surfaces of equipment and shelves, tables, sinks, cabinets, refrigerators, ranges, hoods, etc., kept clean 10*; necessary facilities provided for cleaning and sanitizing (Comply Item 13, Restaurant Regulations) 20#; clean uten-

sils and equipment properly stored and protected 10*; single service articles properly stored and handled and clean cloths 10* ---------- 170_____

8. (c) FOOD SUPPLIES AND PROTECTION: ICE HANDLING: FOOD SUPPLIES: All food clean, wholesome, from approved sources, properly identified 20‡; SHELLFISH: Shellfish from approved sources, properly stored and handled (Permit ‡_____): single service shipping containers not reused, shucked shellfish properly stored 10*; MILK SUPPLY: Grade A pasteurized milk for drinking, individual containers or approved dispensing, reconstituted milk for cooking only 20‡; FOOD PROTECTION: Adequate during storage, preparation, display and service, potentially hazardous food below 45° F. or above 140°F, storage facilities adequate, all refrigerators with thermometers; pork, stuffings, etc., thoroughly cooked; meat and poultry salad; potato salad, etc., handled as required, no re-serving, adequate facilities for cold and hot food storage display, food containers stored above floor and protected from splash and other contamination 60†; ICE HANDLING: Ice stored and handled in sanitary manner; ice clean; storage chests, houses, ice makers, scoops, containers etc., properly located, in good repair and clean 20‡ ------ 130_____

9. CONSTRUCTION AND MAINTENANCE REQUIREMENTS: FLOORS: Easily cleanable construction, in good repair 10*, space for all operations, no obstacles to cleaning, kept clean 10*, graded to drain where required 10*; WALLS AND CEILINGS: Clean and in good repair 20‡, easily cleanable, light color where required, washable to level of splash, where required 10*; LIGHTING AND VENTILATION: Adequate in all rooms as required 10*, fixtures, equipment in good repair and clean 10‡, special vents for kitchens, toilets, etc., clean 10* ---------- 90_____

10. SOLID WASTES: Garbage in standard containers, properly covered and stored; container cleaning facilities, containers, storage room or area clean; dry rubbish in suitable receptacles; approved disposal of all wastes 60† ---------- 60_____

11. VERMIN CONTROL, PREMISES, STABLES: Outside openings effectively screened or otherwise protected against entrance of flies, etc., or flies absent 10*, effective control of rodents and other vermin 40*, pesticides registered and properly used and stored 10*, premises clean and free of vermin harborages and breeding areas 30*, no birds or animals in kitchen or dining areas 10*; STABLES: Stables properly located, manure removed and disposed of so as to minimize fly breeding 10* ---------- 100_____

12. FOOD SERVICE EMPLOYEES: Clean coats, caps, or special dress 20‡, clean hands and work habits 30‡; MANAGEMENT: First aid services and medical and nursing supervision provided 20* ---------- 60_____

13. Miscellaneous: Potentially hazardous materials, equipment and apparatuses, properly handled and stored, protective railing and fences, etc., provided and in good repair 10* ------ 10_____

Total 1000

DATE _____

SIGNED _____ AGENT
N. C. State Board of Health

Form ‡435
Rev. 3/11/71 & 1/72
SBH Form 1050
Sanitation

July 20, 1971

ACCIDENTAL INJURIES IN YOUTH CAMPS

It is estimated that 250,000 injuries occur each year in youth camps in the United States which require medical attention or restriction of activities for one day or more. This estimate is based on several limited studies of this problem in local communities. The studies indicate that only a small proportion of those injured require medical attention beyond the initial treatment. Therefore, only a small number require hospitalization or a second visit to a physician. Contusions, abrasions, and punctures are the most frequent types of injuries experienced. The next most frequently reported type of injuries are lacerations. Burns and fractures account for about 7% and 1% of the cases, respectively. One study indicates that cabins, playfields, and the pool, waterfront and water ski areas are the locations where accidental injuries occur most frequently.

In the United States each year about 18 million children under age 16 are injured and about 60% of these occur in or around the home. For children 6 to 16 there are about 12 million school days lost each year because of accidental injuries and about 5,000,000 injuries are reported. Since there are 40,000,000 individuals of this age group in the United States, the accidental injury rate is 150 per 1,000 population per year. Our best estimates indicate that about 8,000,000 children and youth attend camps each year. The 250,000 injuries which are estimated to occur each year establish a rate of 31 per 1,000

population per year. Corrections for exposure time would have to be made in order for those rates to be meaningful.

Some impressions of the relative severity of the accidental injury problem in youth camps and in this age group generally can be obtained by comparing injuries which occur at schools with those occurring in camps. About 2,500,000 school injuries each year are due to recreational activities (both organized and unorganized). Adjusting the school injuries for lengths of season (36 weeks vs. 2 weeks at a camp per person) and time spent at the activity (estimated to be 16 times more in camps than at school) gives us about 275,000 recreation related injuries for schools. Thus, schools have a slightly higher incidence of recreation related injuries compared with youth camps after adjustments for time are made.

More than 15,000 accidental deaths occur annually in this age group (0-15 years). The exact number of these deaths which occur in youth-camps has not been determined but general impressions are that the number is small and not disproportionate when exposure time is considered. Deaths from drowning and those related to transportation are probably the most numerous.

Because of the limited amount of information available about the accidental injury problem in youth camps further study of the extent and nature of the problem including a review of practices and requirements in the various States concerning such activities as accreditation, licensing, and inspection is necessary to provide a basis for determining program needs to provide improved protection of health and safety of youth while attending camps.

Senator CRANSTON. You indicate that ACA supports uniform minimal health and safety standards for all camps, but you indicate that ACA's standards go far beyond such minimal health and safety concerns.

Would you describe briefly now and amplify in writing the differences between the ACA standards and what you would consider to be minimal health and safety standards; and, would you explain why you feel Federal legislation should only address minimal health and safety standards?

Mr. BALL. I will be glad to do that.

I would just say in a succinct fashion that those primarily relate to programs and personnel standards. But we will try to provide that.

[The following was subsequently received for the record:]

ACA's Standards are a collection of 227 practices that have been researched and accepted by professionals as important steps toward improving the camp experience. Of these—14 are required of every camp accredited and considered the absolute minimum. 100 are applicable only to camps with certain programs or serving special populations, such as physically disabled. The balance are divided in four sections and a camp must score at least 75% in each section and an overall minimum score of 80%. Standards are weighted differently depending on their relative importance. For instance, a Standard requiring a registered nurse in camp may be weighted heavier than a Standard requiring the camp have a budget.

Many of the Standards relate to program or administrative areas that may affect the quality of the camp experience but not materially affect the health and safety of the camper such as:

C-3—Has the camp director completed a workshop, institute, seminar, or course related to camping and/or environmental education within the last three years?

Senator CRANSTON. Do you feel that—let me ask first, would you explain why you feel Federal legislation should address only minimal health and safety standards?

Mr. STOLZ. I think we are talking about the common denominator, Senator, that is acceptable to all camps in the country. We realize many camps cannot be meeting the requirement that we seek for ACA accreditation. Also we believe in trying to keep the Government out of the programmatic features of camping, other than as relates to health and safety.

Senator CRANSTON. Do you feel that the adoption of such minimal Federal standards would have a substantial impact upon improving conditions in youth camps?

Mr. STOLZ. We believe so very firmly.

Senator CRANSTON. Are you aware of any data indicating that camping is safer for children in the 13 States which have meaningful camp health and safety standards?

Mr. STOLZ. Senator, I wish I could answer that, because I do not think anybody in the country has any truly accurate data.

I would like to have Larry answer that question.

Mr. GRAHAM. I would like to add to that, that we see no significant change in Texas as a result of any laws that have been passed.

Senator CRANSTON. Again, Mr. Stolz, you indicate in your written testimony, on page 8, your support, although I gather somewhat reluctant, for legislation which addresses youth camp health and safety through voluntary State participation.

Is this still your position?

Mr. STOLZ. There is reason for the reluctance, Senator. I think the record proves that most States would not be doing anything on a voluntary basis . . . they've had many years to do so already and only 13 have been so inclined.

I am a little concerned with having a Federal law, which leaves a large percentage of the Nation's youngsters uncovered and unprotected.

Senator CRANSTON. I appreciate your concern for the children in those States left out because of the States' unwillingness to participate voluntarily.

On the other hand, one approach in an area such as this where there is relatively little experience or information is to begin a program of voluntary participation and upgrading of State programs.

Then, if those programs show a meaningful difference in the number of injuries, there would be a basis for movement toward mandatory participation.

Significant questions have been raised regarding whether there is information to indicate that mandatory Federal health and safety regulations would make a significant difference in the number of the security of camp injuries.

Do you have any thought on that approach?

Mr. STOLZ. Well, that test pattern is without controls. I do not think we could have any valid, statistical answer. I would guess the States that are already doing it, would be the States participating in such a volunteer, Federal effort, and the rest remain unknown.

I am not sure what difference that would show.

Senator CRANSTON. Would you give us some thoughts on that and supply it for the record?

Mr. STOLZ. I will be happy to.

[The following material was subsequently received for the record:]

There is no clear statistical evidence that any health or safety regulation makes a significant difference in the number of camp injuries—whether mandatory, voluntary, county, state or federal! The efforts of previous federal studies raise serious questions in methodology and results.

There is no evidence that the voluntary approach will in any way encourage the 20 states which have no significant regulations to develop any. There is reason to believe that most of the 13 states which have comprehensive laws and the 15–17 states that have excellent health and sanitation laws will utilize the federal incentive funds to strengthen or subsidize their existing programs.

In regard to statistics, perhaps the most significant steps the federal government could take would be to mandate a registration of all camps and reporting of all deaths and serious accidents in camps across the country.

This effort would provide the statistics everyone desires and indicate the seriousness of the problem, as well as comparisons between states. Such a move could not cost as much as either S. 285 or S. 2907 suggest be allocated.

Senator CRANSTON. Did you have a comment?

Mr. GRAHAM. Every time the subject comes up we like to point out if there is a serious problem in the State, it seems like the parents that are suffering the problem would be the first to complain and from all the States that are not complaining, it would be nice to assume that they do not have a problem.

Senator CRANSTON. Texas is one of the States—I would like to turn to you now, Mr. Graham—Texas is one of the States generally regarded as having a meaningful youth camp safety law.

When were the Texas laws adopted?

Mr. GRAHAM. About 3 years ago.

Senator CRANSTON. Why did the Texans enact these laws?

Mr. GRAHAM. The threat of Federal legislation.

Senator CRANSTON. Have the camp operators in Texas experienced any significant difficulties in operating under those laws?

Mr. GRAHAM. No, the laws have changed camp operation very little in Texas.

Senator CRANSTON. Do you think the State has adequate resources to monitor enforcement of its State laws in this area?

Mr. GRAHAM. Yes, sir, the health department monitors the State inspections and they are done very successfully.

Senator CRANSTON. What type of data are collected by Texas as a result of these laws?

Mr. GRAHAM. The health department, of course, after only 3 years has limited data but they do collect accident ratios every year, and they have begun to centralize the other laws that exist into one agency and it has actually helped the camps to some degree.

Senator CRANSTON. Do you believe that there are some sort of minimal health and safety regulations which should be applied to all youth camps by some level of government, whether it be county, State, or Federal?

Mr. GRAHAM. I believe that there is a minimal level of standards that should be applied to each camp. Exactly who should apply it, is the question. We feel that the Federal Government should not. It is even questionable if the State government should.

But if there is a choice, we feel that the State government should.

Senator CRANSTON. Do others of you have a comment on that point?

Mr. BUTTRAM. Yes, sir, we agree. As far as the parent is concerned, we believe that the responsibility that is entailed in the issuance in any kind of accreditation, whether it be private or public, carries with it probably more than can be warranted by that agency. The record shows even the accrediting organizations have difficulty making sure that a camp is maintained at the standard throughout the period in which the symbol is used. We hesitate to see anything come that diminishes the parents' responsibility for making a decision. Obviously, they do make the decision, but think they have the primary responsibility.

It is really the parents' responsibility to see that the camp they send their children to is safe. We agree that the camp operator has a minimal health and safety responsibility although at the Wilds, we exceed that minimum by a great deal.

Senator CRANSTON. What do you require be given parents to show what standards are going to be met?

Mr. BUTTRAM. Most of our campers come as a group from a church, therefore the individual pastor or youth worker has been to the camp and inspected it on his own. He then comes back with his group as a personal certification.

Senator CRANSTON. Could you tell us what Texas requires, if anything, be given a parent?

Mr. GRAHAM. Texas has a fairly extensive list of administrative data that is provided to the parent, but it has nothing to do with

their accreditation or their safety level. It is just their ability to administer.

The parents that come to camp in the area have as their safety recommendation, those campers who attended the year before and the parents on their own who visited camps.

I would like to stress in this last series of questions that although we are camp owners and operators, the answer to those questions come directly from our thousands of parents and not the camp operators. The parents themselves feel that they are the best judge and that the Federal legislation would not assist them very much.

Senator CRANSTON. Is the camp actually required to give information out?

Mr. GRAHAM. The camp is required to provide the necessary administrative information but it is not required to provide the parents with a list of inspection data of how they stand up against the State inspection unless the parent asks for them.

Senator CRANSTON. Specifically, is it required to give information on the health and safety circumstances of the camp to the parents?

Mr. GRAHAM. If it is requested.

Senator CRANSTON. If it is requested?

Mr. GRAHAM. Yes, sir.

Senator CRANSTON. Why should there not be an obligation to voluntarily give that without waiting to be asked?

Mr. GRAHAM. In the sake of paperwork. If the information is not necessary and already known, it is a great expense and duplication to provide everybody with every bit of information.

Senator CRANSTON. How are parents going to make an informed choice if they do not have that information?

Mr. GRAHAM. It has been our experience that parents go out of their way to dig out that information.

Senator CRANSTON. Why should the obligation be on the parents to dig it out rather than on the camps to make it easily available and readily available, and actually available?

Mr. GRAHAM. It is readily available, however, it falls into a fairly questionable situation just as does whether people can sell to you over the telephone and give you information that you are not asking for. There are numerous packets that would be sent out by each camp covering exactly what they teach, exactly what the safety requirements are, how their performance has been in the last years, and it is a very extensive amount of information for a small business to send out unrequested. Most of this information is covered in the camp catalog that is sent to parents.

Senator CRANSTON. Could you give us for the record a substantiation of the assertion that it would be a costly exercise to perform?

Think that out and give it to us for the record.

Mr. GRAHAM. All right.

In a small business like a camp, you can expect the net profit to approach something like $20,000 a year. If you have 400 campers and you have to mail them three mailings a year at different intervals, each mailing is costing something like $1 apiece, so when you get up into $1,500 against a $20,000 net, that is a significant amount of additional expense.

Senator CRANSTON. You make mailings in your sales pitch.

Could not you include such information without causing additional cost?

Mr. GRAHAM. Yes, sir.

Senator CRANSTON. I would like you to analyze that and give it to us for the record.

[The following was received for the record:]

The actual cost of this requirement alone would be negligible. I do realize, however, that several negligible expenses put together can be diasppointingly significant.

Senator CRANSTON. One of the approaches to the youth camp safety issue being considered is legislation which would provide technical and financial assistance on a matching basis to States which seek assistance in upgrading or enforcing their own State laws in this area.

Do you think there is a need for such legislation?

Mr. GRAHAM. I think that what HEW is currently doing has been helpful without any significant change in legislation.

We would certainly hesitate to indicate support of new legislation that might encroach on what is already being done.

Senator CRANSTON. Thank you very much.

Mr. Buttram, I would like to turn to you briefly——

Mr. STOLZ. Senator, may I answer a question, please?

In your last series of questions, you were indicating a desire for a disclosure statement.

Senator CRANSTON. I am asking questions about it.

Mr. STOLZ. I would like to respond to that also.

Could you indicate what sort of information you had in mind that you feel youth camps should be furnishing to parents?

Senator CRANSTON. I am asking questions as to what is provided parents so that they know what standards are going to be enforced at a given camp.

Mr. STOLZ. In contrast to just general information on what the camp offers?

Senator CRANSTON. Specific information on the health and safety standards that the camp will pursue.

Mr. STOLZ. Thank you.

Senator CRANSTON. Mr. Buttram, what type of State regulation of youth camps exists today in North Carolina?

Mr. BUTTRAM. We have 24 different local, that is, county, State, and Federal agencies that we report to. The primary ones pertaining to the operation of a youth camp concern sanitation, health, and safety. They would be the normal food service and sanitation provisions. Also we deal with the Department of Agriculture on the Federal level, EPA in regard to wilderness and sewage treatment facilities and things of that sort.

In our State the two areas that we believe might be possible candidates for State legislation would be in the waterfront area, rifle and archery ranges.

As far as we know, there is no comprehensive statute that covers swimming areas. There are health statutes that pertain to water quality, but we are talking about the number of lifeguards and that

kind of thing. If a definite showing of need is made we would not object.

One of our legislative proposals was that an area of aquatic inspection could be added to the public health inspection that is given our camp each year before it opens for the summer. Bear in mind we have a year-round operation so we have inspections all the time but we do have special inspections prior to our summer season.

We think perhaps waterfront, and the rifle range or archery range, would seem to be other areas that local and State standards could be effectively developed if a need for them is shown, and included in the public health inspection. Additionally, some suggestion has been made with regard to transportation facilities.

In our situation we have very little transportation involved in our camp. Most of the campers come by their own transportation or in school buses provided by the churches. Those buses are already regulated by State law.

Senator CRANSTON. Do you feel that North Carolina laws in this area are adequate or do you think there are areas where they could be improved?

Mr. BUTTRAM. With the exception of those two areas I mentioned, I think they are adequate.

Senator CRANSTON. Are you familiar with the activities of the Atlanta Center for Disease Control in the area of youth camp safety?

Mr. BUTTRAM. We have tried to become more familiar, but we have not been successful. I talked to Dr. Lisella on his way out. We have offered to be a part of the comprehensive survey which they proposed before the House committee last year and were unable to key in on what they were doing.

Senator CRANSTON. Why?

Mr. BUTTRAM. I do not know, sir.

We made the request in person, and in writing, and to Congressman Mann's office, and we never did get a meaningful response.

We tend to feel, or at least a lot of our camp organizations tend to feel that since we are not members of the major organized camping associations, and since for the most part we represent church groups that do not participate in the large church councils, that we—although we are significant factors are largely overlooked. So we attempted to correct that, but we did not really get what to me, at least, was a satisfactory response. I do not mean to criticize them.

Senator CRANSTON. Is it your impression that their activities are useful?

Mr. BUTTRAM. We find that insofar as the book of suggested State statutes and regulations is concerned it is instructive at least. As far as it relates to our particular camp we believe that our standards in the matter of health and safety are far more stringent than those in that book. Additionally they are enforced by our insurance underwriters with continuing inspections.

I could not really cite any specific instances but I think CDC's intention has been to be helpful.

Senator CRANSTON. Do you think the Federal Government should be providing more technical assistance to States and help them develop their own State program?

Mr. BUTTRAM. Well, speaking of North Carolina, a part of the genesis of this recent bill considered in the last legislature, arose from the legislature's erroneously belief that, "Congress is going to pass this bill anyway, so you better get your own bill in place and cover your own hide."

We attempted to point out to the North Carolina Legislature that the way the national bill was drawn, that was not a proper nor effective response.

Senator CRANSTON. Could the Federal Government help States or help camp operators and interested organizations in developing sound programs by technical assistance?

Mr. BUTTRAM. In my opinion their help would be minimal. Their ability to help an operator in North Carolina, or an operator in New Hampshire has to be considered on a case-by-case basis. That would seem to be more appropriate on the State level than the Federal.

Senator CRANSTON. Thank you very much.

We will now go to our next group, Julia Abrams, member national board, Girl Scouts of the U.S.A., accompanied by Kathleen B. Ross, national representative; L. S. Christofero, director, camping outdoor division, Boy Scouts of America; Connie Coutellier, camp director, Camp Fire Girls, Inc.; accompanied by Walli Klores, director, Washington office, Camp Fire Girls, Inc.

Thank you very much for your presence.

Those of you who will be testifying, please seek to summarize in not more than 5 minutes. We have limited time available for this hearing.

So we appreciate your cooperation in that respect.

Who is going first?

STATEMENT OF JULIA ABRAMS, MEMBER, NATIONAL BOARD OF DIRECTORS, GIRL SCOUTS, U.S.A., ACCOMPANIED BY KATHLEEN B. ROSS, NATIONAL REPRESENTATIVE, GIRL SCOUTS, U.S.A.; L. S. CHRISTOFERO, DIRECTOR, CAMPING/OUTDOOR DIVISION, BOY SCOUTS OF AMERICA; CONNIE COUTELLIER, CAMP DIRECTOR, CAMP FIRE GIRLS, INC., ACCOMPANIED BY WALLI KLORES, DIRECTOR, WASHINGTON OFFICE, CAMP FIRE GIRLS, INC.

Mrs. ABRAMS. Mr. Chairman and members of the Subcommittee on Children and Youth, Girl Scouts of the U.S.A. appreciates this opportunity to testify on Federal youth camp safety legislation. My name is Julia Abrams. I am a member of the National Board of Directors of Girl Scouts of the U.S.A.

Girl Scouts of the U.S.A. was founded in 1912 and chartered by Congress in 1950 with the purpose of "inspiring girls with the highest ideals of character, conduct, patriotism, and service that they may become happy and resourceful citizens," and has served more than 32 million girls throughout our history. It is the largest organization for girls in the country and operates the largest and most varied camping program for girls.

We have always supported standards and practices to insure the health and safety of our youth. We continue to do so. Today, nearly 3

million girls ages 6 to 17 are active in more than 160,000 troops assisted by 500,000 adult volunteers. Girls join the Girl Scouts to take part in a dynamic program of frequently vigorous activities. Most of all, they join and stay with the Girl Scouts because of camping.

GIRL SCOUT STANDARDS

Girl Scouts of the U.S.A. first developed health and safety standards for camping early in the 1920's. The standards manual has been revised many times. Copies of the 1977 revision have been submitted to the subcommittee. A new edition of Safety-Wise was completed and made available to all troops in the fall of 1977.

Generally, safety principles have been revised to incorporate an updating of safety procedures and techniques, a building of a safety consciousness, an added emphasis on rationale, and an expanded concern for the environment. The need to consult safety related community organizations as a local resource is also emphasized.

Along with these general revisions, there are more specific changes including the addition of safety checkpoints for horseback riding, roller skating, and arts and crafts.

National staff and volunteers regularly visit council resident camping sites.

National Girl Scout staff are located in five regional or national branch offices. They are responsible for providing needed services to Girl Scout councils, so that the councils can carry out the Girl Scout program in accordance with the policies and standards of Girl Scouts of the U.S.A. Visits to councils by the council consultant are frequent, with an audit for charter review held every 3 years. In most instances, council camp and program sites are visited on an average of once every 3 years.

Inspections are made by a national staff member or by persons who are selected and trained by national staff. The visitation plan includes procedures to follow up in the accreditation of a site plus planned follow up with the council's officers and executive staff.

Injuries and fatalities:

Girl Scout procedures require the reporting of "serious accidents" to the national organization; however, interpretation of the term "serious" varies. In 1973, in preparation for our appearance before Representative Dominick Daniels' subcommittee we sent out a questionnaire asking that local councils report to us accidents which occurred that year and defined "serious" as an accident in which the victim was admitted to a hospital or in which life, function, or disfigurement was threatened. From all reported sources, we found 36 children who sustained injuries which local councils deemed serious enough to report to us. When we estimated the total number of camping days involved in all kinds of Girl Scout camping and calculated the injury rate, we found that there were approximately 0.005 "serious" injuries per 1,000 camper days. Of the 36 injuries reported, 16 resulted from falls, 7 from horseback riding, 3 from snakebite, 2 from winter sports, and 8 from other causes. For 1974, 1975, and 1976 we have been able to obtain the following data.

There were two fatalities during each of these years. One death was the result of a sledding accident, one camper fell from a cliff and

four persons drowned, three were nonmembers and two were 15-year-old males.

Ten "serious" accidents were reported in 1974, with four "serious" accidents being reported in 1975 and again in 1976. Of the 18 "serious" accidents reported during this 4-year period, 4 resulted from horseback riding, 3 from winter sports, 3 were related to cooking activities and 8 from other causes.

When we estimate the total number of camping days involved in all kinds of Girl Scout camping and calculate the injury rate for 1974, 1975, and 1976 we find that there were approximately 0.001 serious injuries per 1,000 camper days.

Girl Scout councils have always had the ongoing responsibility for continuous, critical study and evaluation of camps in relation to health, safety and security. The murders of three Oklahoma Girl Scouts and the disappearance of a girl from a day camp in Florida the summer of 1977 reinforced this commitment. The Girl Scouts of the U.S.A. took leadership in developing a special guide to help councils study their security program in depth and to tighten security plans when indicated.

This guide was the first material in the camping field to address the problem of security in camps. We have shared the guide with the camping committee of the national safety council, the national camp executive group (representing the major youth organizations and church groups active in the camping field) and the American Camping Association.

As a result of these studies, Girl Scout councils in cooperation with local law enforcement agencies have already taken action to expand training and education programs for both camp staff and campers, to expand communications systems, improve security procedures, and are considering "building" security into site and facility designs.

The Girl Scout camping program is vast, diverse, and serves a great many girls. We share your concern that all children may attend any type of camp with the certainty that the program and the site will be operated in such a manner that the campers' experience may be a safe one.

Our years of experience in camping have demonstrated to us that safe, healthful camps may be operated in many ways on many kinds of campsites. Girl Scouts of the U.S.A. firmly believes that all children who attend camp should be protected by the very best camp safety regulations. Girl Scouts developed and has been operating under its own health and safety standards for well over 50 years.

Girl Scouts has cooperated with the American Camping Association to a significant degree all across the country. Girl Scouts has been working with the Center for Disease Control of the Department of Health, Education, and Welfare in Atlanta, Ga. over the last 4 years, as have other major camping groups in the country to develop model State guidelines for youth camp safety regulation and to develop special publications in the areas of white water canoeing, archery, arts and crafts, watercraft, scuba and skindiving, water skiing, firearms, horseback riding, caving, mountaineering, and on the trail.

This has been a good effort of the Department and we hope it will be continued with adequate funds and staff. Girl Scout councils in

many States are working closely with the appropriate State officials to develop State regulations.

We applaud the subcommittee efforts to review the need for Federal youth camp safety legislation. Should you decide to develop specific legislation we recommend your including: The definitions of camping as presented in H.R. 6761, a State youth camp advisory committee, and clear indication of the intent of Congress that the States assume responsibility for the development and enforcement of youth camp safety standards. Girl Scouting will continue to support sound health and safety practices and we hope you will consider us a resource for you to tap in your deliberations.

We would be happy to furnish the subcommittee with any additional information we have on health and safety practices or related matters.

Thank you.

[The prepared statement of Mrs. Abrams follows:]

Girl Scouts of the United States of America

NATIONAL HEADQUARTERS
830 THIRD AVENUE
NEW YORK, NEW YORK 10022
(212) 751-6900
CABLE CODE: "GIRLOUTS, N.Y."

TESTIMONY

OF

GIRL SCOUTS OF THE UNITED STATES OF AMERICA

BEFORE

SUBCOMMITTEE ON CHILDREN AND YOUTH

OF

THE UNITED STATES SENATE

MARCH 21, 1978

FOUNDED MARCH 12, 1912
CHARTERED BY CONGRESS MARCH 16, 1950

32-168 O - 78 - 9

Mr. Chairman and Members of the Subcommittee on Children and Youth, Girl Scouts of the U.S.A. appreciates this opportunity to testify on federal youth camp safety legislation. My name is Julie Abrams. I am a member of the National Board of Directors of Girl Scouts of the U.S.A.

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Along with these general revisions, there are more specific changes including the addition of safety checkpoints for horseback riding, roller skating, and arts and crafts.

National staff and volunteers regularly visit council resident camping sites.

National Girl Scout staff are located in five regional or National Branch offices. They are responsible for providing needed services to Girl Scout councils, so that the councils can carry out the Girl Scout program in accordance with the policies and standards of Girl Scouts of the U.S.A. Visits to councils by the Council Consultant are frequent, with an audit for charter review held every three years. In most instances, council camp and program sites are visited on an average of once every three years.

Inspections are made by a national staff member or by persons who are selected and trained by national staff. The visitation plan includes procedures to follow up in the accreditation of a site plus planned follow up with the council's officers and executive staff.

INJURIES AND FATALITIES

Girl Scout procedures require the reporting of "serious accidents" to the national organization; however, interpretation of the term serious varies. In 1973, in preparation for our appearance before Representative Dominick Daniels' subcommittee we sent out a questionnaire asking that local councils report to us accidents which occurred that year and defined serious as an accident in which the victim was admitted to a hospital or in which life, function or disfigurement was threatened. From all reported sources, we found 36 children who sustained injuries which local councils deemed serious enough to report to us. When we estimated the total number of camping days involved in all kinds of Girl Scout camping and calculated the injury rate, we found that there were approximately .005 serious injuries per 1,000

camper days. Of the thirty-six injuries reported, 16 resulted from falls, 7 from horseback riding, 3 from snakebite, 2 from winter sports, and 8 from other causes. For 1974, 1975 and 1976 we have been able to obtain the following data:

There were two fatalities during each of these years. One death was the result of a sledding accident, one camper fell from a cliff and four persons drowned, three were non-members and two were 15 year old males.

Ten serious accidents were reported in 1974, with four serious accidents being reported in 1975 and again in 1976. Of the 18 serious accidents reported during this four year period, 4 resulted from horseback riding, 3 from winter sports, 3 were related to cooking activities and 8 from other causes.

When we estimate the total number of camping days involved in all kinds of Girl Scout camping and calculate the injury rate for 1974, 1975, 1976 and 1977 we find that there were approximately .001 serious injuries per 1,000 campers days.

Girl Scout Councils have always had the ongoing responsibility for continuous, critical study and evaluation of camps in relation to health, safety and security. The murders of three Oklahoma Girl Scouts and the disappearance of a girl from a day camp in Florida the summer of 1977 reinforced this commitment. The Girl Scouts of the U.S.A. took leadership in developing a special guide to help councils study their security programs in depth and to tighten security plans when indicated.

This guide was the first material in the camping field to address the problem of security in camps. We have shared the guide with the Camping Committee of the National Safety Council, the National Camp Executive Group (representing the major youth organizations and church groups active in the camping field) and the American Camping Association. As a result of these studies, Girl Scout Councils in cooperation with local law enforcement agencies have already taken action to expand training and education programs for both camp staff and campers, to expand communications systems, improve security procedures and are considering "building" security into site and facility designs.

TYPES OF GIRL SCOUT CAMPING

Each of the basic types of Girl Scout camping -- resident camping, troop camping or short term group camping, and day camping -- has its own unique characteristics and variations, meets particular needs of girls, and provides a special service to the local community.

Resident Camping

In Girl Scout resident camping, girls attend as individuals, not with their troop. The resident camp serves girls from the entire council and often includes girls from neighboring councils. Sessions are 6-14 days in length, and camps operate with a staff employed for the entire season. Although sites are generally permanent, facilities vary from being almost resort-like to being quite rugged and rustic. In 1976, approximately 175,000 girls -- both members and non-members -- attended the 444 resident camps operated by local councils. Girl Scout camping standards incorporated in the 1977 revision of the booklet entitled "Safety-Wise" which you have before you cover the operation of these camps.

Short-term Group Camping or "Troop" Camping

Short-term group camping or "troop" camping of an ongoing neighborhood group in which responsible adult volunteers who have worked with the children on a regular basis and who have taken training for their jobs as Girl Scout leaders, go camping. The size of the troop, the ratio of girls to adults, the criteria for site selection, and other health and safety factors are regulated by Girl Scout standards. Choice of site, activities, and length of stay are determined by the needs, age, and experience of the girls in the troop and the qualifications of the adult volunteer leadership.

"Troop" camping, because of the neighborhood base of the troop and the low cost, serves more girls than any other kind of public or private camping in the United States. Our data indicate that there were approximately 2,500,000 troop camper days in 1975. All Girl Scout troops are allowed and urged to go "troop" camping if the troops meet camping standards.

Some "troop" camping takes place on campsites owned by Girl Scout councils and which are fully developed, that is, they have cabins, sanitary facilities, and fully equipped kitchens. Some takes place at private vacation homes. Other troops use public camp grounds or sometimes completely undeveloped land either privately or publicly owned. On undeveloped sites, girls pitch tents, build primitive sanitary facilities, and cook over open fires. Frequently, all the Girl Scout troops in a neighborhood or community may join together and go "troop" camping at the same time and at the same site. The fathers of the girls help set up hundreds of these large encampments.

Local councils enforce Girl Scout safety standards for "troop" camping. These standards include the regulation of personnel and training requirements, sanitation, first aid, food handling, water supply, equipment, swimming, small craft practices, and emergency procedures as well as other matters which affect health and safety. Contributing to the safety of "troop" camping is the fact that the troop is a

neighborhood group. The girls know their leaders, the leaders know the girls, and the parents know and have confidence in these adult volunteers who are usually their friends and neighbors. Girl Scouts of the U.S.A. recommends inclusion of a definition of short-term group camping or "troop" camping in any federal youth camp safety legislation which is developed as well as a directive to the Secretary of the Department of Health, Education and Welfare to distinguish its special characteristics from those of resident and travel camping in order to insure the development of appropriate and applicable regulations.

Day Camping

It is in the field of day camping that the many years of experience of the Girl Scout organization is particularly unique. Each year, approximately 400,000 children go day camping at 3,500 Girl Scout day camps, staffed by 50,000 adult volunteers. The camps are usually operated for only a brief period and are located close to the children's homes. Campers walk to the site or have only a short bus ride. Most day camps operate from 9 or 10 in the morning to 3 or 4 in the afternoon, although some operate during the late afternoon and early evening hours. These unusual hours make it possible for volunteers who work during the day to be counselors at day camp at night and for teenagers to participate in some of the day camp activities.

Although girls may make reservations to attend day camp through their troops, they usually attend as individuals not as part of the troop.

Most day camp sites are borrowed. That is, the council does not own them or does not lease them on a basis which is profitable to the leasor. Sites vary greatly. City streets, vacant lots, farm land, club houses of veterans organizations or public parks may all be used. Sessions are from 5 to 10 days in length, and many of the sites are temporary, set up just for the one brief session. Although the total day camp program of each council is usually administered by a member of the professional staff of the local council, the day camp is staffed and set up by

volunteers, many of whom are the mothers and fathers of the children.

Since there is little site maintenance expense and few paid staff, fees are very low. Both the low cost as well as the fact that the camps are operated by community volunteers and are visible to the citizens of the community contribute to the success which the Girl Scouts have had in reaching inner city dwellers, ethnic minorities and the poor with a summer day camp program. Girls in isolated rural areas also benefit from day camp -- often the only special program for girls in their community each summer. Many of the children who attend Girl Scout day camps will never have an opportunity for other kinds of camping experience.

The health and safety standards of the Girl Scout organization cover all aspects of site selection, personnel, and operation of day camps. The volunteers who serve as staff for the day camps are mature and are trained for their positions.

Regulations regarding sites and facilities appropriate for the resident camping situation would not necessarily be applicable to the day camping situation and unless appropriate distinctions are made in the federal youth camp safety legislation this very vital program which serves nearly a half million Girl Scouts each year could be curtailed. These distinctions are reflected in the language in H.R. 2518, now pending in the House, which provides a definition of day camping supported by a directive to the Secretary of HEW to give separate consideration to the unique qualities of the day camping experience.

Travel and Trip Camping

Travel and trip camping is conducted on the same general basis as troop camping. The major difference is that in troop camping, the troop goes to a specific site and stays for the duration of the excursion. In travel or trip camping the troop moves from site to site. Some councils operate trips on a councilwide basis so that individual girls may make reservations to go on a trip with a group other than her usual neighborhood troop. In these cases -- such as a canoe trip on the

river or a backpack trip on the Appalachian Trail -- the counselors may be either volunteers or paid staff. But in any case, Girl Scout safety standards apply.

AFFILIATION WITH THE AMERICAN CAMPING ASSOCIATION

Over the years Girl Scouts and the American Camping Association have been supportive of one another at both the national and local levels. Wherever the American Camping Association is active Girl Scout adults can be found serving as ACA trainers, camp visitors, and as members of ACA boards, committees and special task groups. Of 300 Girl Scout councils reporting in a 1977 survey, over 80% indicated they had camp administrators and/or camp staff who were members of the ACA. Approximately 80% of the resident camps operated by these same councils have ACA accreditation. Girl Scout involvement in ACA is entirely voluntary. Some Girl Scout councils have chosen not to be involved, while others find that their geographic isolation (Alaska, some Rocky Mountain States) makes it financially impractical for them to attend ACA meetings or for ACA to send representatives to the council's camps. Because of this heavy Girl Scout involvement in ACA, the standards of the two organizations strongly reflect the thinking of one another.

SUMMARY

The Girl Scout camping program is vast, diverse and serves a great many girls. We share your concern that all children may attend any type of camp with the certainty that the program and the site will be operated in such a manner that the campers' experience may be a safe one. Our years of experience in camping have demonstrated to us that safe, healthful camps may be operated in many ways on many kinds of campsites. Girl Scouts of the U.S.A. firmly believes that all children who attend camp should be protected by the very best camp safety regulations. Girl Scouts developed and has been operating under its own health and safety standards for well over 50 years. Girl Scouts has cooperated with the American Camping Association to a significant degree all across the country. Girl Scouts has been working with the Center for Disease Control of the Department of Health, Education, and Welfare

in Atlanta, Georgia over the last 4 years, as have other major camping groups in the country to develop model state guidelines for youth camp safety regulation and to develop special publications in the areas of white water canoeing, archery, arts and crafts, watercraft, scuba and skindiving, water skiing, firearms, horseback riding, caving, mountaineering and on the trail. This has been a good effort of the Department and we hope it will be continued with adequate funds and staff. Girl Scout councils in many states are working closely with the appropriate State officials to develop state regulations.

We applaud the Subcommittee efforts to review the need for federal youth camp safety legislation. Should you decide to develop specific legislation we recommend your including: the definitions of camping as presented in H.R. 6761, a state youth camp advisory committee, and clear indication of the intent of Congress that the states assume responsibility for the development and enforcement of youth camp safety standards. Girl Scouting will continue to support sound health and safety practices and we hope you will consider us a resource for you to tap in your deliberations. We would be happy to furnish the Subcommittee with any additional information we have on health and safety practices or related matters. Thank you.

Senator CRANSTON. Who is going next?

Mr. CHRISTOFERO. I am L. S. Christofero, the director of the camping/outdoor program of the Boy Scouts of America.

Sir, you have our written statement so I will go through it and make some comments.

Senator CRANSTON. Thank you.

Mr. CHRISTOFERO. We have been chartered by Congress and we have been operating our camp inspections in 400 local councils across the country. We have a set of national standards for our scout camps which are entered on the record and I think you have copies of them.

I want to point out here that the inspection of these camps is not voluntary on the part of the camps. They are mandatory and are conducted annually in all of the scout camps. They are conducted by trained personnel, skilled personnel. They are oriented each year in 27 separate areas across the country. After we conduct these inspections all of the reports come back to us and naturally we go over them and in places where we have concern, our national committee authorizes the local area to investigate why these camps have certain deficiencies that they do.

We also do considerable training of our camp staff, first through our manuals that we publish and update every year and second, through a series of week-long national camp schools. We conducted about 40 of these schools across the country to make it easy for the staff to get to. They are conducted through our regional offices, in those regions, but mainly they are conducted by, again, skilled, trained, volunteers, and professionals.

We bring in outside experts on health, safety and sanitation to participate as faculty.

For our health and safety emphasis we have a national health and safety committee and a professional division in the Boy Scouts of America that work with local councils and they also provide a precamp inspection list in which local councils can use, to determine whether or not the camps are safe before they open their camps.

Regular summer camp inspections are conducted while our Scouts are in the camp because we want to see it in action. This is done early in the camping period.

In addition to this, in our periodicals, and this is Scouting magazine, which goes out to every adult leader, we quite often publish articles on health and safety and how to conduct health and safety operations.

In fact, in our current one, there is one on page 19, and I will leave it for the record if you are interested.

[The following was supplied for the record:]

LIFESAVERS

Unit leaders health and safety guidelines

The Boy Scouts of America's National Health and Safety Committee has put together a list of procedures and precautions that will ensure safer activities for your unit, whether at home, at camp or on the road. Follow these guidelines and alert your boys and fellow Scouters to think health and safety at all times.

- Encourage the practice of good health habits among the members of your unit. Several times a year invite someone in the health profession for a presentation. Also encourage members of your unit to have a health-related display at Scout shows.
- Before going to summer camp or on a long tour, make sure that all members of your unit have a complete physical examination by their family physician. Use BSA medical form, No. 4410, available from your Scout council service center.
- See that your Scouts and leaders participate regularly in a vigorous physical activity program. Before particularly arduous events such as long hikes, sports activities, high-adventure camps, physical fitness contests and Explorer Olympics, have all participants go through specific conditioning for each event. It's also best for *all* adults and youngsters who take part to have a complete physical exam before the event occurs. Develop a program of exercise preparatory to this type of activity. See Personal Fitness merit badge pamphlet under "Building Your Body" for a typical program. Seek help from the merit badge counselor on this subject or a local physical education instructor or coach. Be ready before you start out!
- While hiking, especially on high-adventure activities, be sure that no one overexerts himself. Know about hypothermia and heat exertion and abide by the rules to prevent those dangerous conditions. See that everyone in your unit knows the basic principles of wilderness survival. (For a copy of the pamphlet, "Hypothermia and Cold Water Survival," visit your nearest U.S. Coast Guard Boat Safety Office or write Headquarters, U.S. Coast Guard (G-BAE), Washington, D.C. 20590. Refer to Scouting's *Fieldbook* for information about heat exertion and wilderness survival.)
- Avoid hiking on highways. But if you do it by necessity, hike against the traffic, single file on the shoulder, if possible. Wear something highly visible on the right knee.
- During bicycle touring and camping, travel only during daylight and obey the rules of the road. Use *Cycling* merit badge pamphlet as a resource. And remember, do your bicycling on the right shoulder of the road *with* the flow of traffic. You might also check your area for bikeways. Many states and communities have recently developed attractive bicycle routes that provide protected roadways or trails for cyclists. Contact your state highway department, safety council or write to Bicycle Manufacturers Association of America, 1101 15th Street NW., Washington, D.C. 20005.
- File tour permits at your council office—local (No. 4426) for trips of less than 250 miles one way from home area, must be filed two weeks beforehand. National (No. 4419) for traveling 250 or more miles one way or crossing national boundaries, must be filed one month in advance. Use a local tour permit for day activities if driving is involved.

Obey all transportation safety rules as described in *Tours and Expeditions*, No. 3734.

- Avoid traveling in convoy; never overload cars; use seat belts and shoulder yarnesses; when trucks are used, be sure passengers ride in the cab.
- Have a complete unit first aid kit. See that the majority of your commissioned leaders are qualified Standard Red Cross first aiders with CPR (cardiopulmonary resuscitation) certification. There are a variety of first aid kits available. Develop one that suits your conditions best. Heart attack is responsible for the greatest number of fatalities among adults on Scouting activities. Knowing CPR may save a friend.
- At all unit activities where swimming is permitted, abide by the Safe Swim Defense plan. See that all leaders in charge of outings are qualified and carry a Safe Swim Defense Commitment Card, No. 4243. Also, review the filmstrip "Safe Unit Swim," available from most Scout council service centers.
- Have fire drills at regular intervals at camp and during pack, troop, post, den and patrol meetings. In camp use the Fireguard Plan, No. 3691.
- Never use open flames in your ceremonies if your meeting room is coded as unsafe for such activities.
- Knowing the health hazards of tobacco, set a good example by not smoking.
- Have a regular annual meeting place inspection, using form No. 6140. Urge your chartered organization to correct any deficiencies.
- Follow published national and local council liquid fuel policies. Use liquid fuel only if no other fuel is available and permissible. For instance, at some parks and recreation areas, no wood or charcoal fires are permitted. Store all liquid fuel in Underwriters-and OSHA (Occupational Safety Hazards Act)-approved safety cans, properly labeled. (See Troop Fireguard Plan, No. 3691.) Do not start fires with liquid fuel.
- Never use flames in tents (no smoking, no catalytic heaters). Never leave fires unattended. Before leaving your campsite, put all fires dead out.
- Be sure that the members of your unit use tools—knives, axes and saws—only in a safe manner and that they are not used as plaything. Make "Totin' Chip," No. 4234, a part of your training.
- Use *Program Helps* and *Boys' Life* in planning safety-related activities for troops and packs. This year the October theme for Cub Scouts is *Be Firesafe* and for Scouts, *Safety First*.

All about canoeing

To say that a book is "definitive" puts a mighty heavy burden on it. You expect it to be the ultimate authority. *Canoeing* by the American Red Cross is definitive. It's got a chapter on everything from canoe sailing to canoe history with stops in between on canoeing equipment, transporting the craft, paddling, much more. Perhaps best of all are sections on rescue, first aid, canoe repair and trips.

The paperback volume (Stock No. 321125) costs $3.95. Order the book from your local Red Cross chapter.

Mr. CHRISTOFERO. We do have some concerns.

First of all, we wish to say this: That we continue to support the intent of youth camp safety regulations but we express these concerns:

One: That the Federal Government in its responsibility place emphasis on encouraging the States to enact and promulgate their own youth camp safety statutes and regulations.

I believe that is in the Senator's own opening statement here, that that would be the best thing, first.

Second: That in both Federal and State levels, that the advisory committee be given proper emphasis. The advisory committee to include adequate representation of the camping organizations and the public.

And in Senator Ribicoff's statement, he said in his home State of Connecticut, the State law does require that there be an advisory committee.

I do not believe that is in S. 258.

Then, the third concern that we have is that proper consideration be given to adequate selection, training, and orientation for those who would be inspecting the camps. If the Federal law is passed, then comes the responsibility of training people who can conduct adequate and skillful inspections of these camps across the country.

We do have one other concern, not mentioned here, and that is that the statement is made that there are 250,000 accidents in camps across the country each year.

We think that there should be some kind of a classification of those accidents. What constitutes a recordable accident? Is it a cut finger which requires a bandaid, or a broken leg? Simply to say that, there are 250,000 accidents leaves some question as to what type of accidents they are and the validity of the statement.

As we have stated in our hearings in the past, and we have been to every one that has been requested of us, we support the intent of this and the other congressional committees in providing safe and healthful camping for all young people who are in that kind of business.

But since S. 258 does not provide for State or Federal youth camp advisory boards, we cannot support this bill as it is now written.

I wish to reiterate that we support, of course, the intent of this kind of legislation.

Thank you.

Senator CRANSTON. Thank you very much.

[The prepared statement of Mr. Christofero follows:]

TESTIMONY CONCERNING

YOUTH CAMP SAFETY ACT

S-258

Before the

Subcommittee on Child and Human Development

Presented by:

National Council, Boy Scouts of America

Washington, D. C. March 21, 1978

THE BOY SCOUTS OF AMERICA AND CAMPING

Since the Boy Scouts of America is chartered by Congress and reports to that body each year, we are very much aware of our responsibility to provide safe, healthy camping for young people.

In our 417 local Scout councils across America, we operate 600 long-term summer camps annually.

During the five year period (1973-1977) over 3,000,000 young people have participated in our long-term summer camps.

NATIONAL STANDARDS FOR SCOUT CAMPS

The Boy Scouts of America has been a strong advocate of youth camp safety throughout its history. For over 45 years, it has conducted annual inspections of its camps using a constantly updated and revised plan called "National Standards for Scout Camps." It is important to note that these inspections are conducted early in the season, but while the camp is in operation.

These inspections are conducted by skilled personnel who are trained and oriented each year in over 28 areas of the country. Inspections are mandatory and are conducted annually.

CAMP STAFF TRAINING AND CERTIFICATION

1. Camping literature in the following manuals:

   Managing the Council Outdoor Program, #12001
   Summer Camp Program, #12002
   Aquatics Program, #12003
   Camp Business Management and Commissary Operation, #12005
   Field Sports, #12020
   Camp Health and Safety, #3692
   Promoting the Great Adventure, #3699

2. National Camping Schools -- Each year 40 schools are conducted throughout the country to train and qualify personnel who will be holding key positions of management and program in each camp. They must be certified by the National Council before actual employment.

These camp schools are developed by national Boy Scouts of America staff personnel and conducted by trained staff people in the six Boy Scouts of America regions. "Outside" experts on health, safety and sanitation participate as faculty for these schools.

HEALTH AND SAFETY EMPHASIS

A national Health and Safety Committee and professional staff work with local councils in establishing policies and procedures to conduct safe camps. The Health and Safety arm of the Boy Scouts of America projects directly through to local councils in order to assure that all activities are conducted with emphasis on safety.

This emphasis provides each local council and camp with a "Precamp Inspection Checklist" for checking items of health, safety, and sanitation. Councils are required to conduct these inspections before opening camps and certifying this action to the National Council through regions.

CONCERNS OF THE BOY SCOUTS OF AMERICA

The Boy Scouts of America as it supports the intent of youth camp safety legislation respectfully expresses these concerns:

1. That the federal government in its responsibility place emphasis on encouraging the states to enact and promulgate their own youth camp safety statutes and regulations.

2. That in both federal and state levels that the Advisory Committee be given proper emphasis. The Advisory Committee to include adequate representation of the camping organizations and the public.
3. That proper consideration be given to adequate selection, training and orientation for those who would be inspecting the camps.

As we have stated in many hearings in the past, the Boy Scouts of America supports the intent of this and other Congressional committees in providing safe and healthful camping for all young people.

However, since S-258 does not provide for state or federal youth camp Advisory Boards, the Boy Scouts of America cannot support S-258 as it now is written.

Respectfully submitted,

BOY SCOUTS OF AMERICA

L. S. Christofero

L. S. Christofero
Director
Camping/Outdoor Division

3/14/78 hc

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Ms. COUTELLIER. Thank you for the opportunity to share with you the view of Camp Fire Girls, Inc., on youth camp safety legislation.

I am Connie Coutellier, the camping administration specialist for Camp Fire Girls, Inc. As such I serve as the national staff member responsible for camping services to local Camp Fire Girls councils. The national corporate headquarters is located in Kansas City, Mo. Before taking this position, I have been a professional camp administrator/director for 13 years in three States and have attended attended camps as a child. I have been a member of the American Camping Association since 1962 and have served in various local offices of the association as a volunteer.

Camp Fire Girls, Inc., in keeping with its 68 years of conscious concern and action on behalf of youth, suports the intent of the Federal youth camp safety legislation and more specifically the board of directors of Camp Fire Girls, Inc., voted to support H.R. 6761 of the Youth Camp Safety Act.

Camp Fire Girls, Inc., consistent with its position of active involvement in the professional camping community, supports and has had input in the development of the position statement of the American Camping Association. We believe that the resources of the professional camping community should be used, both at Federal and State levels, in establishing minimum youth camp safety standards and in implementation of such standards.

When Camp Fire Girls, Inc., was founded in 1910 it was in a camping setting. The founder believed that the camping experience was an extraordinary opportunity to influence the lives of girls in the future.

That position and conviction is reflected today in the approximately 335 local councils across the country. Each council provides the opportunity for a camping program for the youth in their communities. There are nearly 400 day camps and 200 resident camps operated by chartered councils of Camp Fire Girls, Inc., encompassing 25,000 communities throughout the United States. Nearly a quarter million youth camp each year in groups or camps under Camp Fire sponsorship.

Camp Fire councils, when receiving their charters to conduct programs under the name of Camp Fire Girls, Inc., are required by national bylaws to operate according to established policies and standards of Camp Fire Girls, Inc. Therefore, all Camp Fire camps and camping programs are required to meet the program standards and the day, resident, and group camping standards of Camp Fire Girls, Inc. These standards address themselves to the welfare of children in the areas of administration, personnel, program, sanitation, health, safety, sites, facilities, and equipment.

You have a copy of those statements.

[The prepared statement of Ms. Coutellier and additional material supplied for the record follows:]

Camp Fire Girls, Inc. 4601 Madison Avenue, Kansas City, Missouri 64112 / (816) 756-1950

STATEMENT OF CONNIE COUTELLIER,

CAMPING ADMINISTRATION SPECIALIST,

CAMP FIRE GIRLS, INC.

YOUTH CAMP SAFETY ACT TESTIMONY

March 21, 1978

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* * * *

Camp Fire Girls, Inc., in keeping with its 68 years of conscious concern and action on behalf of youth, supports the intent of the Federal Youth Camp Safety legislation and more specifically the Board of Directors of Camp Fire Girls, Inc., voted to support H.R. 6761 of the Youth Camp Safety Act.

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When Camp Fire Girls, Inc., was founded in 1910 by Dr. Luther Halsey Gulick, it was in a camping setting. The founder believed that the camping experience was an extraordinary opportunity to influence the lives of girls in the future.

That position and conviction is reflected today in the approximately 335 local councils across the country. Each council provides the opportunity for a camping program for the youth in their communities. There are nearly 400 day camps and 200 resident camps operated by chartered councils of Camp Fire Girls, Inc., encompassing 25,000 communities throughout the United States. Nearly a quarter million youth camp each year in groups or camps under Camp Fire sponsorship.

Camp Fire councils, when receiving their charters to conduct programs under the name of Camp Fire Girls, Inc., are required by National bylaws to operate according to established policies and standards of Camp Fire Girls, Inc. Therefore, all Camp Fire camps and camping programs are required to meet the Program Standards and the Day, Resident & Group Camping Standards of Camp Fire Girls, Inc. These standards address themselves to the welfare of children in the areas of Administration, Personnel, Program, Sanitation, Health, Safety, Sites, Facilities and Equipment.

Through its professional training for camp directors and in workshops for boards of directors and camping committees, the Camp Fire Girls standards are reinforced and interpreted. Local boards and staff are responsible for the implementation of those standards in their camps. In each and every instance of camping and outdoor activity, safety standards are an integral part of the training and education of the adults and youth involved in the programs.

Because the philosophy of Camp Fire Girls camping is child-centered rather than activity-centered, we believe that our organization evidences in its safety practices a regard for the well-being of children unparalleled in the field. We are not only concerned with health, safety and sanitation, but with the atmosphere of living that evidences concern for people. In such an environment, safety of a physical kind is inherent.

Our concern if camping is to become legislated is that it is done in the best interest of children and in such a way that it is reasonable and protective of children while at the same time encouraging the type of educational outdoor experience identified in Camp Fire Philosophy of Camping. (see attached)

We support youth camp safety legislation because of our concern for all children in all camps of whatever persuasion and leadership.

We, therefore, recommend that any Senate Youth Camp Safety Legislation enacted include the following:

1. Enforcement of Youth Camp Safety regulations in all states thus providing equal protection under law for all children in all camps.

2. State Youth Camp Advisory Committees be utilized and given authority for the writing, implementation and periodic review of state plans.

3. Authority for carrying out the Y.C.S.A. be given the Secretary of HEW. If states are privileged to implement state Youth Camp Safety plans within the general framework established by the Federal act, it is not necessary to establish an Office of Youth Camp Safety. The Secretary should have no administrative or enforcement authority in states carrying out their own plans.

4. Federal Regulations be limited to identification of general areas to be regulated and kinds of appropriate enforcement procedures.

5. The term group camping be included and the following definition used:

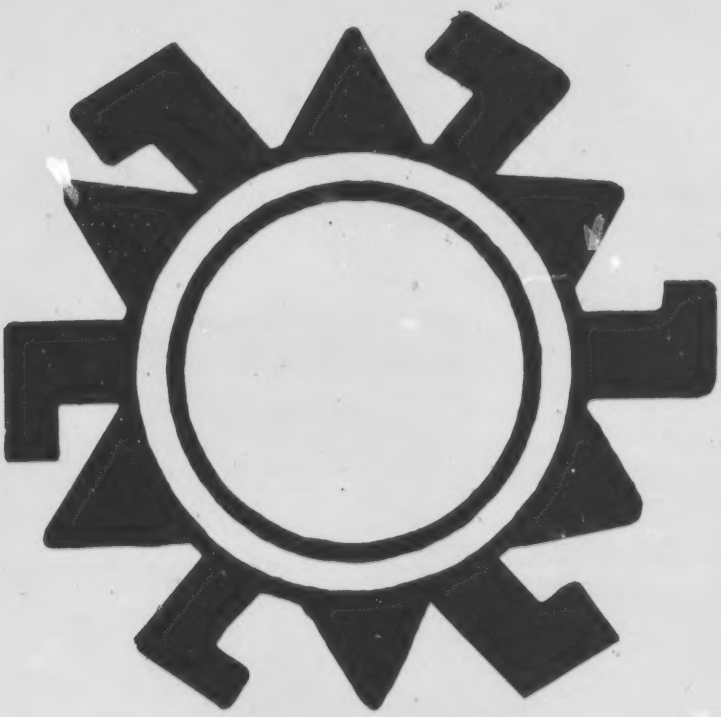
   "Short term group camp means an organized camping activity of more than a 24-hour period but less than a 96-hour period for groups, clubs, and troops of campers sponsored by an organization or person."

6. If the term camping is used it should be included in the definitions as follows:

   "Camping means a sustained experience which provides a creative, recreational, and educational opportunity in group living in the out-of-doors. It utilizes trained leadership and the resources of natural surroundings to contribute to each camper's mental, physical, social, and spiritual growth."

Camp Fire Girls concurs with the American Camping Association and urges adoption of the H.R. 6761 or the amendment of the S. 258 to conform with the recommendations submitted. As in the past, Camp Fire Girls, Inc., will continue to offer its resources in an effort to develop and implement Federal Youth Camp Safety legislation that is in the best interest of children.

CAMP FIRE GIRLS, INC.



DAY, RESIDENT AND GROUP CAMPING STANDARDS

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CAMPING STANDARDS

Camp Fire Girls, Inc.
1740 Broadway
New York, N.Y. 10019

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Cat. No. D-85

DAY CAMPING STANDARDS

ADMINISTRATION

I. ORGANIZATION

The responsibilities connected with the administration of a council's camping program are carried by the board of directors, the camping committee, and the professional staff.

A. Board of Directors:

The board of directors is accountable to the community for the council's camping program.

B. Camping Committee:

1. The National Annual Camp Report form, with such supplementary materials as will give a complete picture of the season's operations, should be prepared by the executive director, camp director and camping committee; it should be complete and comprehensive; it should be based upon the various records of the season.

2. Definite plans for year-round care and maintenance of grounds, buildings, and equipment should be made and carried out by the camping committee. These must be related to the long-range plan for camp development, including land management and conservation of natural resources.

C. Professional Staff:

1. The executive director

She is accountable to the board for the camp, its administration, facilities and program. She should be trained in camping through attendance at Camp Fire Girls, Inc., Camping Administration Training Course.

2. The camp director

As a member of the year-round staff, the camp director is responsible for:

a) interpreting to the camping committees and to camp staff standards for camp and seeing that they are maintained

b) acting as resource to the executive director and the camping committee on the total operation of camp and working directly with the day camping sub-committee

c) organizing and administering the camp program as an integral part of the total Camp Fire Girls program

d) recruiting, selecting, placing, training, supervising, and evaluating the performance of the camp staff

e) organizing and administering business details of camp operation

f) maintaining physical facilities and equipment by co-ordinating the work of volunteers, and supervising the camp caretaker and/or other camp maintenance employees

g) evaluating the camp program and operation, and making reports and recommendations at the close of the season.

If the camp director is a seasonal director available only for the camping season, the executive director will assume entire responsibility for some of the pre-camp and post-camp duties of the camp director. The responsibilities of a seasonal director are essentially the same as those of a full time director with appropriate exceptions.

II. BUSINESS MANAGEMENT

The board of directors and the professional staff must be guided by the policies and recommended practices of the National Council of Camp Fire Girls, Inc., on financing.

A. Financing:

1. A camp budget of estimated income and expenditures, based on actual figures of previous seasons and future plans, must be prepared by the camping committee and submitted for the season. A report of camp income and expenditures, in comparison with the budget, should be given to the board of directors at the end of the season.

2. There must be compliance with all local, state, and federal regulations applicable to camps -- Social Security, all taxes and exemption from taxes, licenses and permits.

B. Insurance:

1. Survey of camp insurance should be made periodically by a competent insurance counselor. Valuation of property should be checked annually. Adequate insurance coverage is based upon replacement value rather than depreciated valuation.

2. There should be adequate insurance to cover facilities, property and personnel as well as campers.

3. Comprehensive liability.

4. Motor vehicle:

   a) cars owned by the council and used for day camp purposes should have property damage, bodily injury liability, fire, theft, collision, passenger-carrying liability.

   b) buses or private cars used in transporting campers must have adequate insurance.

5. Workmen's compensation.

6. Medical reimbursement insurance for campers, staff, and work parties.

If day camp site is owned by council

7. Fire and extended coverage of day camp property and equipment.

8. Periodic survey of day camp insurance by a competent insurance counselor. Valuation of property should be checked once a year to insure adequate coverage.

C. The following records should be kept and filed for varying lengths of time, depending on different factors such as legal reasons, historical value, etc.

1. Registration cards for campers and written consent of parents for campers' attendance.

2. Medical records of examinations, accidents to and illness of campers, staff or others, first aid and treatments (these should be retained until possible claims, following attainment of legal age, are outlawed under the state statute of limitations).

3. All permits, inspection reports, water tests, etc., issued by local, state, or federal authorities.

4. Statistical data for permanent records and reports -- enrollment, attendance, finance, insurance.

5. A written agreement between owner of property and group using it, whether rented, leased, or borrowed.

6. A written agreement with all camp staff receiving salaries.

7. Written agreements with owners of public carriers covering transportation arrangements.

8. Inventory of supplies -- where purchased, amounts, cost, and place where any surplus is stored for winter; copy of inventory for auditor.

9. Complete records of equipment, where and when purchased, cost, condition, where stored for winter, etc.

10. Copies of statistical, financial, and program reports sent to national headquarters and regional office.

11. Any records required by minimum wage and hour laws, Social Security, income tax, withholding tax, etc.

If day camp site is owned by council

12. Deed to day camp property -- which should be recorded with the local register of deeds -- and a map showing boundary lines of camp property.

13. Blueprints of day camp buildings and charts showing water, sewage, and electrical systems.

III. PUBLIC RELATIONS

A. A definite plan should be drawn up to provide for continuous interpretation of day camping as an integral part of the year-round program of Camp Fire Girls.

B. An attractive camp folder should be prepared and distributed to tell the story of the day camping program to girls and parents.

C. Camp should hold a membership in the proper classification in the American Camping Association. It is suggested that camping committee members hold individual memberships in the American Camping Association.

PERSONNEL

All camp staff members must meet basic qualifications which are defined as follows:

1. Maturity and emotional stability which are expressed in a sympathetic understanding of, liking for, and ability to work with people, both children and adults.

2. Personal philosophy of camping which includes appreciation of the intangible values which the camper may attain as well as the measurable gains through participation in varied activities.

I. ADMINISTRATIVE STAFF -- QUALIFICATIONS

A. Day Camp Coordinator:

1. Be at least 25 years of age.

2. Have at least six weeks of actual camp leadership experience as an adult staff member in a resident or day camp.

3. Administrative and supervisory experience.

B. Day Camp Director:

1. Be at least 25 years of age.

2. Have at least six weeks of actual camp leadership experience as an adult staff member in a resident or day camp.

3. Ability to supervise staff and a knowledge of the group process.

4. Administrative and/or supervisory experience.

5. Ability and willingness to assume final responsibility for the administration of the camp; to delegate, as necessary, responsibility for business administration, training and supervision of staff or program.

C. Assistant Day Camp Director:

1. Be at least 21 years of age.

2. Have had camp leadership experience.

3. Have ability to supervise staff and a knowledge of the group program.

D. Business Manager:

1. Training and experience in business procedures.

2. Be at least 21 years of age.

E. Nurse:

1. Be at least 21 years of age.

2. Be a registered nurse, or a licensed practical nurse, or a graduate nurse eligible for registration or a currently certified American Red Cross First Aid Instructor.

F. Unit Director:

1. Be at least 21 years of age.

2. Ability to organize unit camp living and program and to supervise unit.

G. Program Specialist:

1. Be at least 18 years of age.

2. Proficiency in her particular program area.

H. Counselor:

1. Be at least 18 years of age.

2. Have had previous camping experience or experience pertinent to camping.

I. Waterfront Staff (if program includes swimming):

1. Director:

a) current certification as American Red Cross Water Safety Instructor

b) be at least 21 years of age

c) ability to organize and supervise the total aquatic program

d) previous experience in teaching and supervising aquatic program activities.

2. Waterfront counselors must be at least 18 years old and hold current American Red Cross Water Safety Instructor or Senior Lifesaving certificates.

3. There must be one waterfront counselor to each group of ten campers in water at one time.

II. TRAINING OF STAFF

Both pre-camp and in-camp training should be provided as follows:

A. Pre-camp Training:

1. Should be a minimum of 16 hours.

2. Should include at least one day of training at day camp site.

3. Should include philosophy and purpose of camping, program activities, and leadership techniques needed in day camp programming.

4. In-camp training should include regular staff meeting, individual conferences, observation, and evaluations.

III. PERSONNEL PRACTICES

A. All staff must be selected carefully.

B. Each person should have a written job description including specific responsibilities of her position and the relationship of this position to the total day camping program.

C. There should be written agreements with any paid staff members.

D. Staff assignments with a clear delineation of responsibility, accountability, and authority as defined in the job description, should be understood and observed.

E. Medical examinations are desirable for protection of staff and the camp.

PROGRAM

I. The camping program, as an integral part of the total Camp Fire Girls program, is built upon philosophy, objectives, and program of Camp Fire Girls.

II. The camping program must be based on the knowledge, appreciation, and use of the natural facilities of the camp surroundings, and wise use and preservation of natural resources.

III. The camping program should be planned with the objective of meeting the interests, needs, and desires of each age group.

A. Length of a day camp session must be at least five days within a two-week period.

B. Number of campers in a unit should not exceed thirty-five.

C. Groups within the units should be small -- eight to ten Camp Fire Girls and not more than eight in the case of Blue Birds.

D. An adult counselor should be assigned to each group and be responsible for the girls in that group during each day.

E. A ratio of at least one counselor to eight Blue Birds and one to eight-ten other campers must be maintained. (Ratio is exclusive of director, nurse, program specialists, and Horizon Club Aides.)

IV. The program should provide opportunity for participation on individual, group, and all-camp levels since a camping experience should not be an isolated but an integral part of the child's total living experience.

A. Emphasis should be placed on the type of program which will contribute to the physical, mental, emotional, and spiritual growth and development of the individual camper, and her successful adjustment to group living.

B. The program should be flexible and give evidence of change.

C. The program should be stimulating. It should provide the challenge of new and different activities which may not be a part of year-round group programs.

V. The camping program should provide a growth experience for the camper. There should be evidence of:

A. Wholesome and constructive fun, new experiences, and adventure in outdoor living.

B. Opportunities to participate in the planning.

C. A feeling of competence in some program areas and experience in others.

D. A sense of security in belonging to a group.

E. Sufficient rest and quiet.

F. An atmosphere of unhurried, relaxed living so individual campers may participate at their own tempo and avoid physical and mental fatigue.

VI. Horizon Club girls may assist day camp counselors in program activities.

A. They should be Program Aides in Outdoor Living.

B. They should assist counselors in group activities.

C. They should be given opportunities to participate in activities of their own choice with their own age group during the day camp season.

SITE, FACILITIES, AND EQUIPMENT

I. SITE SELECTION AND DEVELOPMENT

A. Acquisition and development of new camp sites should be done in consultation with the Camping Department, Camp Fire Girls, Inc., and in accordance with camping standards of Camp Fire Girls, Inc., so the objectives and purposes of the camp program may be realized. The help of recognized state and local authorities in such areas as health, sanitation, construction, and maintenance should be sought.

B. A long-range plan for camp development, land management, repairs and maintenance, and conservation of natural resources should be drawn up and used as the basis of all planning and development.

C. Camp Fire Girls councils, unless using federal, state, or municipal property under long lease, must acquire title to camp site to protect investment in permanent improvements and to permit long-term planning.

D. A camp site should have a minimum of 1/2 acre of ground per camper. Consideration must be given to possible need for future expansion and to land development in the area.

E. All buildings and sanitary facilities should be constructed and maintained in accordance with state and local building codes.

F. Buildings should be of design and materials suited to the natural environment and climate.

G. Wells must be constructed and maintained according to state and local regulations.

H. If springs are the source of camp water supply, state or local health authorities should be consulted for the best means of protection against pollution.

I. Location of latrines must be approved by the state and/or local health authorities. Latrines, toilets, septic tanks, cesspools, waste pools, and other places of waste disposal must be located so underground water supplies, lakes, and streams are not contaminated.

J. Selection of natural swimming areas, design and construction of waterfront facilities should be done in consultation with American Red Cross or other recognized authorities and should meet their recommendations.

K. All swimming pools must be constructed so purification, circulation, and filtration meet the standards of state and local laws. In the absence of such laws, the recommendations of the American Red Cross should be followed.

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L. There should be sufficient program equipment in good operating condition to carry out the stated objectives and the program activities of the camp.

M. The site must have adequate privacy.

N. The site should be accessible to the majority of the girls. No girl should travel more than one hour to reach the site.

O. There must be assurance of an uncontaminated supply of water for all purposes in amount sufficient for present needs and future expansion and development.

P. The site should have good natural drainage and be conducive to disposal of wastes.

Q. Topography should have variety and beauty and should, as far as possible, be free from poisonous plants, insects, and reptiles, dangerous cliffs, swamp and flood areas.

R. The site should provide possibilities for a wide variety of outdoor activities suitable to the Camp Fire Girls camping program.

II. FACILITIES

A. It is necessary to provide adequate shelter if the program is to be continued in event of inclement weather. If the camp is divided into units, such shelter should be provided for each unit.

B. Provision should be made for safe storage of supplies at the site.

C. There must be adequate, approved sanitary facilities easily accessible to the camping site:

1. Toilet facilities in ratio of one seat for every twenty persons.

2. Provisions for handwashing near the latrines.

D. If a public beach or pool is used, it must be an approved swimming area and must meet requirements of state laws and American Red Cross recommendations.

E. If a non-public swimming area is used, there must be careful investigation of purity of water, danger of pollution, and factors such as holes, current, undertow, condition of bottom and beach, etc.

HEALTH

I. HEALTH PROGRAM

A. A registered nurse, licensed practical nurse, graduate nurse or first aid instructor, should be a member of the camp staff and must work under standing orders of a licensed physician.

B. There must be a definite place for first aid treatment where first aid equipment is kept and nurse or first aid person can be readily located.

C. There should be understanding by camp director, nurse, and other staff, regarding reason for limiting program activities of any specific camper or staff member.

D. There should be continuous and careful attention to health factors and personal hygiene by entire staff; alertness to signs of illness or overfatigue with reports of same to nurse; understanding of relationship of the emotional aspects of a camper's life to her physical well-being.

E. There should be careful regulation of program tempo to avoid overfatigue:

1. Actual swimming period limited to thirty minutes.

2. Participation in activities limited to guard against over-exertion and fatigue, and geared to ages of campers.

3. Provision in the camp schedule for adequate rest.

F. Precautions against overexposure to sun, heat, cold, and against altitude reactions.

G. Counselors should have sufficient knowledge of first aid procedures to handle emergencies until services of the nurse can be secured.

H. Careful plans must be made in advance to handle emergencies:

1. Transportation must always be available.

2. There must be access to a telephone.

3. Arrangements for service must be made with a nearby licensed medical doctor and/or hospital.

I. Complete and careful records of health histories and all treatments given during the camp season should be kept at camp. This is important for the protection of the agency.

J. Campers should have a simple but nutritious and filling meal at noon:

1. If campers bring their own food, there should be discussion of what constitutes a good meal.

2. If meals are furnished by camp, highest standards must be observed in quality of food, nutritional values, and cleanliness in preparation.

3. In either case, adequate time should be allowed for an unhurried meal.

II. MEDICAL EXAMINATIONS

A. A permission slip signed by parent or legal guardian giving health history and attesting to camper's physical fitness for participation in day camp activities must be required.

B. A certificate of physical examination of staff is desirable for the protection of camp and the staff member.

C. If swimming or other strenuous activity is a part of the program, a certificate of physical examination by a licensed physician must be presented by each camper and staff member participating.

D. Written permission from a licensed physician to attend camp must be obtained if camper or staff has had a serious operation or illness since last health examination.

SANITATION

I. WATER SUPPLY

A. The water supply should be adequate in volume for all purposes.

B. If not a municipal supply, the water supply should be tested regularly to show it is of safe, sanitary quality.

C. Sources of drinking water must meet public health requirements and should be conveniently located at several places in camp.

D. Water used on trips or hikes must be approved or treated with a purifying agent.

E. Any swimming pool or beach used must be maintained in accordance with state laws governing such pools or beaches.

II. FOOD SERVICE

A. Milk, cream, and other milk products must be pasteurized and provided by an accredited source, in accordance with state regulations.

B. Milk for drinking must be served from the original container (half-pint containers are the most satisfactory for day camp).

C. If food is kept at camp, food storage facilities must be dust-proof, insect-proof, and rodent-proof.

D. Refrigeration should be provided to keep milk and other perishables at 45°F. or less.

E. If campers bring their lunches from home, a cool dry place free from insects and dust should be provided for storage.

F. Dishes and utensils should be kept in a place free from dust, insects, and rodents.

G. All meats should be prepared and served under sanitary conditions.

III. DISHWASHING

A. Dishes and cooking utensils should be washed, sterilized, then air-dried.

B. If it is impossible to wash dishes according to above standards, they should be rinsed in solution of a disinfecting agent and dried with clean towels used for no other purpose.

C. If campers take their dishes home each night, dishes should be washed as above, or rinsed carefully.

IV. SANITARY FACILITIES

A. Latrines should be located, constructed, and operated according to regulations of health department which has jurisdiction over the camp area.

B. Latrines should be well ventilated and completely screened so they are fly-tight.

C. Pit-type latrines must have self-closing covers.

D. Latrines should be provided in ratio of one seat to twenty persons.

E. There should be provision for hand washing near the latrines.

V. GARBAGE AND RUBBISH DISPOSAL

A. Garbage and rubbish (including tin cans) should be disposed of promptly in containers provided for them (if in a public park), by complete incineration, burial, or removal from the camp site.

B. On hikes and trips good camp housekeeping should be observed.

SAFETY

I. PROGRAM

A. Waterfront:

1. All swimming pools and waterfront areas must be under the direct supervision of a person holding a current Water Safety instructor certificate from the American Red Cross.

2. In addition to the waterfront director, there must be at least one qualified assistant for every group of ten swimmers (currently certified American Red Cross Water Safety Instructor or Senior Life Saver at least 18 years of age).

3. All waterfront activities must be supervised at all times by waterfront staff.

4. Equipment must conform to American Red Cross recommendations.

5. Life saving equipment must be kept in perfect order at all times and be quickly and easily accessible. It should include: emergency bell, lifeboat, ring buoys, bamboo poles, surfboard, and other helpful equipment.

6. Pools must be properly fenced; approaches to aquatic areas protected by fences and entrance gates kept locked except during periods when a member of the waterfront staff is on duty.

7. Swimming area must be divided into areas for swimmers of varying abilities and clearly marked with flags, ropes, or other devices for safety.

8. Overcrowding of the swimming area must be avoided.

9. Check or buddy systems must be in force in all swimming areas with the addition of boat patrol in natural areas such as lakes or rivers.

10. Watercraft other than lifeboats must be allowed in swimming area during swimming periods.

11. Watercraft must be used only by those qualified to do so and under supervision.

12. Visitors must not be permitted to use swimming or boating facilities at any time.

B. Craft Shops:

1. Potentially hazardous tools or materials must be used only under careful supervision.

2. Tools must be kept in good condition and in a safe place.

C. Archery:

1. Archery programs should be conducted according to regulations of the Camp Archery Association of the U.S.A.

2. Ranges must be located away from paths, roads, and areas being used for other program activities, so they at no time constitute a hazard, either to participants or non-participants in the activity.

3. Archery must be conducted only under qualified supervision.

4. Equipment must be good condition and suitable for the age of the person using it.

5. Strictly enforced regulations must be in effect and posted regarding shooting, reclaiming of arrows, use of arm guards and finger tabs, storage of equipment.

D. Outdoors:

1. There must be instruction in the proper use and care of tools such as knives, axes, rakes, and careful supervision of their use.

2. Instruction must be given in the choice of sites for fires and in the building and extinguishing of them. Extreme care must be exercised in use of fires and permits secured when required.

3. At least two skilled counselors experienced in outdoor living must accompany campers on hikes and trips, and a ratio of at least one adult to eight girls must be observed.

4. Advance inspection of overnight camp sites should be made when possible in relation to water supply, shelter, swimming facilities, and provision for obtaining help in emergency.

5. A person qualified to administer first aid must be present on each trip.

6. A first aid kit must be a part of the equipment and, in areas where advisable, a snake bite kit should be included, and at least one adult must know how to use it.

7. Swimming must not be permitted unless there is sure knowledge of safe condition of water, bottom, etc.

8. Weight of packs and equipment must be carefully regulated.

9. Physical condition of campers and staff must be carefully checked before participation in long hikes or trips.

10. Staff and campers should be able to recognize the poisonous plants, reptiles, and insects in the camp area in order to avoid them in camp and on trips.

11. Staff and campers should be made aware of hazards connected with contacts with potentially rabid or stray domestic animals.

12. Camp administration must ascertain if any state or local restrictions in relation to rabid animal hazards are in force in camp areas used for trips.

II. FIRE PROTECTION

A. Regular periodic inspection of buildings, grounds, and equipment must be made by a qualified authority. Immediate correction should follow any recommendations.

B. Floors under stoves and heaters, and adjacent walls, must be protected by galvanized iron, cement, brickwork, or other approved material.

C. All heating and cooking installation must meet the approval of fire safety officials.

D. Adequate exits as required by law and outside fire escapes on buildings of more than one story must be provided and kept free from obstruction.

E. Accumulations of rubbish or brush and careless discarding of oil or paint rags constitute a fire hazard and must not be permitted. Containers for gasoline, oils, paints, etc., must be clearly labeled and properly stored in a locked, well-ventilated building at a safe distance from main camp buildings.

F. All electric wiring and light fixtures must be installed, approved, and inspected in accordance with the National Electric Underwriters Association Code.

G. Smoking must be confined to designated places and visitors should be warned of the hazards of indiscriminate smoking in camp.

H. Permits for open fires and incinerators must be secured where required.

I. Adequate fire-fighting equipment must be provided and must be regularly inspected to insure its constant readiness for use. Suitable equipment must be readily accessible in all areas of camp.

J. Procedures should be set up for fighting small fires and camp staff must be trained in the use of all fire-fighting equipment.

K. Plans must be made in advance and practices held for evacuation of camp in case of fire, flood, windstorm or other emergency. Any plan must contain provision for more than one exit from the camp.

L. Arrangements must be made for public fire protection from nearest community; staff must know where and how to summon such service.

M. All staff and campers should know and observe rules of safe conduct in electrical and other types of storms.

III. BUILDINGS AND GROUNDS

A. Environmental hazards such as cliffs, swamps, loose stones, holes, tumps, roots, dead trees, poisonous plants, insects, and reptiles should be eliminated or marked.

B. Buildings should be of sound construction and kept in good repair.

C. Grounds must be kept free of broken glass, nails, or other dangerous objects.

IV. MECHANICAL EQUIPMENT

A. Boilers, motors, stoves, bottled gas equipment, automobiles, and tractors must be inspected regularly, kept in good repair, and operated only by qualified persons.

B. Boilers and pressure tanks must be tested regularly and thoroughly.

C. All mechanical equipment should be properly prepared for periods of disuse.

V. TRANSPORTATION

A. All camp vehicles must meet all safety tests required by state and/or local regulations. They must be maintained in safe condition and good repair.

B. Vehicles must be operated only by persons properly licensed (chauffeur's license if required).

C. Passenger-carrying liability must be carried on all vehicles transporting campers or staff.

D. Vehicles used for transportation of passengers should be fully equipped for that purpose. If trucks are used, safe seating must be provided and standing prohibited.

E. There should be adequate staff besides driver, to maintain order and proper behavior in buses and camp vehicles transporting campers.

F. Each transportation unit must carry adequate first aid equipment.

G. Vehicles must not be loaded beyond their normal capacity.

H. Buses used in transporting campers must be properly licensed, authorized to traverse routes used, and adequately insured. Only buses owned and operated by reputable firms or individuals and with responsible drivers should be used.

I. Vehicular traffic over camp roads should be strictly controlled for safety in camp. Adequate parking areas for staff and visitors should be located away from program and living areas so roads will not be blocked.

RESIDENT CAMPING STANDARDS

ADMINISTRATION

I. ORGANIZATION

The responsibilities connected with the administration of a council's camping program are carried by the board of directors, the camping committee, and the professional staff.

A. Board of Directors:

The board of directors is accountable to the community for the council's camping program.

B. Camping Committee:

1. The National Annual Camp Report form, with such supplementary materials as will give a complete picture of the season's operations, should be prepared by the executive director, camp director and camping committee; it should be complete and comprehensive; it should be based upon the various records of the season.

2. Definite plans for year-round care and maintenance of grounds, buildings, and equipment should be made and carried out by the camping committee. These must be related to the long-range plan for camp development, including land management and conservation of natural resources.

C. Professional Staff:

1. The executive director

She is accountable to the board for the camp, its administration facilities and program. She should be trained in camping through attendance at Camp Fire Girls, Inc., Camping Administration Training Course.

2. The camp director

As a member of the year-round staff, the camp director is responsible for:

a) interpreting to the camping committees and to camp staff standards for camp and seeing that they are maintained

b) acting as resource to the executive director and the camping committee on the total operation of camp and working directly with the resident camping sub-committee

e) organizing and administering the camp program as an integral part of the total Camp Fire Girls program

d) recruiting, selecting, placing, training, supervising, and evaluating the performance of the camp staff

e) organizing and administering business details of camp operation

f) maintaining physical facilities and equipment by coordinating the work of volunteers and supervising the camp caretaker and/or other camp maintenance employees

g) evaluating the camp program and operation and making reports and recommendations at the close of the season.

If the camp director is a seasonal director available only for the camping season, the executive director will assume entire responsibility for some of the pre-camp and post-camp duties of the camp director. The responsibilities of a seasonal director are essentially the same as those of a full time staff person with appropriate exceptions.

II. BUSINESS MANAGEMENT

A. Financing:

1. A camp budget of estimated income and expenditures, based on actual figures of previous seasons and future plans, must be prepared by the camping committee and submitted to the finance committee to be included in the total council budget for approval by the board of directors in advance of the season. A report of camp income and expenditures, in comparison with the budget, should be given to the board of directors at the end of the season.

2. There must be compliance with all local, state, and federal regulations applicable to camps -- Social Security, all taxes and exemptions from taxes, licenses and permits.

B. Insurance:

1. Survey of camp insurance should be made periodically by a competent insurance counselor. Valuation of property should be checked annually. Adequate insurance coverage is based upon replacement value rather than depreciated valuation.

2. There should be adequate insurance to cover facilities, property, and personnel, as well as campers.

C. Records (The records listed below should be kept for an appropriate period of time depending on legal protection and value.):

1. Deed to camp property which should be recorded with register of deeds and a certified survey showing boundary lines of camp property.
2. A written agreement between owner of property and group using property -- whether rented, leased, or borrowed.
3. Copies of a master site plan for development and/or improvement.
4. Blueprints of camp buildings and charts showing water, sewage, and electric systems.
5. Statistical data for permanent records and reports -- enrollment, financial, insurance, taxes, tax exemption.
6. Copies of annual camp reports sent to Camp Fire Girls, Inc.
7. Copies of reports made to local federated fund-raising agency.
8. Record of campership, sources, and recipients.
9. Complete record of equipment, where and when purchased, cost.
10. Complete inventory of equipment, condition, where stored; if borrowed, record of date of return.
11. Medical records for campers, staff, and others. These records include medical examinations, accident and illness, reports, first aid and treatments, standing orders signed by physician.
12. Inventory of food and supplies, where purchased, amounts, cost, and where surplus is stored.
13. Record of government surplus.
14. Record of periodic inspections of all fire-fighting equipment, buildings, grounds and electric wiring.
15. All permits, licenses, inspection reports, water tests, etc., issued by local, state, or federal authorities.
16. Written agreements with all camp staff.
17. Reports on camper referrals from other agencies.
18. Any records required by minimum wage and hour laws, Social Security, income tax, withholding tax, etc.

PERSONNEL

I. ADMINISTRATIVE STAFF -- Qualifications

A. Camp Director:

1. At least 25 years of age.

2. Bachelor's degree from an accredited college or university.

3. At least 16 weeks of administrative and/or supervisory experience in a resident camp.

4. At least two years of administrative or supervisory experience in a field other than camping.

5. Knowledge of the Camp Fire Girls program.

B. Assistant Director:

1. At least 25 years of age.

2. Bachelor's degree from an accredited college or university.

3. At least 12 weeks of administrative or supervisory experience in a resident camp.

4. Administrative or supervisory experience in a field other than camping.

C. Program Director:

1. At least 21 years of age.

2. At least two years of college.

3. At least twelve weeks of actual camp leadership and program experience.

D. Business Manager:

1. At least 21 years of age.

2. Training and experience in basic business procedures.

3. Administrative and/or supervisory experience in a field other than camping.

E. Nurse:

1. At least 21 years of age.

2. Registered nurse, or licensed practical nurse, or graduate nurse eligible for registration, accredited to practice in the state in which the camp is located.

3. Training and experience in first aid.

II. PROGRAM STAFF

A. Counselors:

1. At least federal age of majority
plus
2. One of the following:
   a. Completion of Camp Fire Leadership Lab or Camp Fire CIT program or Camp Fire approved equivalent program.
   b. One year of college.
   c. An equivalent period of satisfactory leadership experience.
   d. An equivalent period of satisfactory work experience.

B. Unit Directors:

1. At least 21 years of age.

2. Two years of college or the equivalent in camping experience. (see above II-A, 2.)

C. Program Specialist:

1. At least 19 years of age.

2. Two years of college or the equivalent in camping experience. (see II-A, 2.)

D. Waterfront Staff:

1. Director

   a) At least 21 years of age.

   b) Holder of current American Red Cross Water Safety Instructor Certificate.

   c) Administrative or supervisory experience in aquatic activities.

2. Assistant Waterfront Director.
(same qualifications as above)

3. Waterfront Counselors

a) At least 18 years of age.

b) Holder of current American Red Cross Water Safety Instructor Certificate, Instructor of Beginner, Senior Lifesaving Certificates.

III. FOOD SERVICE STAFF

A. Food Service Director:

1. At least 21 years of age.

2. Holder of a current food handler's certificate.

3. Experience in planning and supervision.

4. Experience in food purchasing and menu planning.

B. Kitchen and Dining Room Staff:

1. Current food handler's certificate.

IV. ORGANIZATIONAL STANDARDS

A. At least 20% of the program staff shall be 21 years old or older.

B. Camper to counselor ratio:

1. Six Blue Birds to one counselor.

2. Eight Adventure, Discovery or Horison Club members to one counselor.

V. STAFF TRAINING

A. Pre-camp Training:

1. Training shall be at least five days on the camp site.

2. A written course outline or plan for the training should be prepared.

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B. In-camp Training:

1. Regularly scheduled staff meetings.

2. Individual conferences.

3. Regular staff supervision and evaluation.

C. Camping Administration Training Course:

1. Attendance at the first course offered after appointment is required of all full time professionals.

2. Attendance by seasonal directors where possible is encouraged.

VI. PERSONNEL POLICIES

A. Full time professionals should be covered by the council personnel policies for such staff.

B. Provision should be made for full time professionals who have responsibility for the direction of a camp to have supplementary time off during the camping season or a salary adjustment in lieu of time off.

C. A full time caretaker should be covered by the council personnel policies for such staff.

D. The position, qualifications and salary range for a Seasonal Director should be approved by the Board upon joint recommendation of the camping and personnel committee.

E. There should be a written agreement for each staff member specifying job title, dates of employment, remuneration and staff regulations, termination of employment, insurance, time off, and personal conduct.

F. Each staff member should have at least two hours free from responsibility each day and at least twelve consecutive hours off each week.

G. There should be a statement of procedures through which staff members may readily express themselves on matters of camp policies and regulations.

PROGRAM

I. The camp program is an integral part of the total Camp Fire Girls program, carrying out the philosophy, purpose, and program of Camp Fire Girls in an outdoor setting.

II. The camp program should be based on the knowledge, appreciation, and use of the natural facilities of the camp surroundings and wise use and preservation of natural resources.

III. The camp program should be planned with the objectives of strengthening human relationships and meeting the interests, needs, and desires of each age group (Blue Birds, Adventure, Discovery Club, Horizon Club) through unit organization.

A. The number of campers in a unit should be thirty-two or under and must not exceed forty.

B. Tent or cabin groups within the units should be small -- not more than eight campers and preferably not more than six Blue Birds.

C. An adult counselor should live with each cabin or tent group (with the possible exception of teen-age units).

IV. The program should provide opportunity for participation on individual, small group (cabin, unit, and interest group), and all-camp levels because the camping experience should not be an isolated but an integral part of the child's total living experience.

A. Emphasis should be placed on the type of program which will contribute to the physical, mental, emotional, and spiritual growth and development of the individual camper and her successful adjustment to group living.

B. The program should be varied and give the camper an opportunity for choice of activities with counselor guidance. The program should be stimulating and challenging.

V. The camp program should provide evidence of:

A. Wholesome and constructive fun, new experiences, and adventure in outdoor living.

B. Opportunities to initiate activities and participate in the planning in her cabin, in the unit, and through representation in the total camp.

C. A sense of security.

D. Sufficient rest and quiet for all children.

E. An atmosphere of unhurried, relaxed living and a flexible schedule to give opportunities to participate in self-initiated and spontaneous activities at a girl's own tempo.

VI. Provision should be made for meeting the religious obligations of all campers and staff.

VII. Written reports of program activities should be kept to use in compiling records and to provide guidance for another year.

SITES, FACILITIES, AND EQUIPMENT

I. SITE SELECTION

A. The location must provide adequate privacy.

B. It should be easily accessible and within reasonable distance from Camp Fire Girls council headquarters.

C. There must be assurance of uncontaminated supply of water for all purposes in amount sufficient for present needs and future development and expansion.

D. The site should be one with good natural drainage and conducive to disposal of wastes.

E. Topography should have variety and beauty and should, as far as possible, be free from unnecessary hazards such as poisonous plants, insects and reptiles, dangerous cliffs, swamp areas and flood areas.

F. The site should provide possibilities for a wide variety of outdoor activities suitable to the Camp Fire Girls camping program.

G. A camp site should have one acre of ground per camper. Consideration must be given to possible need for future expansion.

H. The camp should be laid out so that administration and service facilities are located conveniently in relation to units and with convenient access for deliveries:

1. Units for younger girls should be located near central facilities.

2. Unit locations should provide adequate space for sleeping quarters and program activities with sufficient distance between units.

3. Cabins or tents should be placed at least 50 feet apart, taking full advantage of favorable site factors.

4. Latrines should be located 75-150 feet from sleeping quarters and must have approval of health authorities.

5. All buildings and sanitary facilities must be constructed and maintained in accordance with state and local building codes.

6. Units of cabins, tents, or other shelters should provide for grouping of campers of same age, similar interests, and experience.

7. Living quarters and facilities should be planned in relation to age group which will use them.

8. There should be storage space for clothing and belongings of campers and counselors and unit equipment.

9. There should be at least 40 square feet of floor space per occupant in sleeping quarters.

10. A unit shelter should be provided for indoor activities during inclement weather.

I. There must be separate quarters to serve as a health cabin:

1. Quarters should include treatment room, isolation room, ward, room for the nurse, and bathroom. Doors should be wide enough for a stretcher.

2. There should be space for storage of supplies with a locked section for medications.

3. Health cabin should be located so as to insure privacy and quiet, and yet be readily accessible to entire camp, including kitchen, and to the main road.

4. Provision should be made for regulating temperature, for hot water, and for a small refrigerator to keep limited quantities of food and medicines requiring refrigeration.

5. Nurse should be the only person living in health cabin.

J. There must be provision for comfortable living quarters and sanitary facilities for kitchen and maintenance staff:

1. Quarters for kitchen staff should be conveniently located but separate from the kitchen and dining hall.

2. Separate quarters for maintenance staff should be somewhat isolated, but readily accessible in emergency.

3. In addition to sleeping, quarters should provide space for relaxation and for storage of clothes and other belongings.

K. There must be a building, room, or tent that affords staff members seclusion from campers and other persons and provides opportunity for relaxation.

L. The director should have comfortable and convenient living quarters, apart from other buildings, with provision for privacy.

M. There should be at least one permanent building of suitable size for the indoor program needs of the camp.

N. Craft shelters should have adequate light, plenty of air, and space for storage. They need not be of enclosed construction.

O. Provision must be made for dry, rodent-proof storage space for permanent equipment such as tents, mattresses, bedding, program equipment, and all food supplies carried over.

P. Swimming areas should be carefully planned to meet current and future needs.

Q. Sleeping Facilities:

1. Sleeping units should provide at least 40 square feet of floor space for each person. Beds should be placed so that heads of sleepers are at least six feet apart, and there are at least 30 inches between beds.

2. Sleeping units must be adequately ventilated.

3. Each person must have her individual bed.

4. Double-deck beds should not be used.

5. Sanitary mattress covers should be changed periodically for all mattresses. Mattresses should be aired before and during camp season.

SANITATION

Camping committee and staff must know and comply with local and state regulations regarding all types of sanitation.

I. WATER SUPPLY

A. The water supply must be adequate in volume for all camp purposes.

B. It must be tested regularly and a written record secured to show it is of safe, sanitary quality.

C. Water used on trips or in outpost camps must be from sources approved by state or other regulatory agency or properly treated with a purifying agent.

D. Potable water system must be independent of any non-potable water system in camp.

E. Water-heating equipment capable of meeting all camp needs must be provided.

II. FOOD SERVICE FACILITIES AND EQUIPMENT

Highest possible standards of cleanliness must be maintained at all times in the storage, preparation, and serving of food, and in personal cleanliness of food service personnel.

A. Food Storage:

1. Food storage facilities must be dust-proof, insect-proof, rodent-proof. Food should not be stored directly on the floor.

2. Milk and perishable foods must be stored under refrigeration at all times, with a temperature 45°F or below.

3. Adequate refrigeration must be provided for perishable foods on out-of-camp trips and for outpost camping.

III. DINING ROOM AND KITCHEN

A. The food preparation and service area must be separated from the dining room.

B. Kitchen and dining hall facilities should be adequate for the size of the camp; allowance should be made for future growth.

C. Provision for adequate ventilation must be made.

D. At least two outside exits must be provided for dining hall.

E. Tables in dining hall should be of size to accommodate eight to ten, including counselor.

F. Kitchen and dining hall equipment must meet sanitary standards and should be adequate for efficient storage, preparation, and serving of food for maximum capacity of camp.

G. Comfortable and pleasant dining space near kitchen should be provided for kitchen and maintenance employees.

IV. BATHING AND HAND-WASHING FACILITIES

A. A sink to be used only for hand-washing should be provided in the kitchen for the kitchen staff.

B. Lavatories, must be provided in ratio of one to eight persons in camp. If wash basins are to be used, each person must have her own.

C. Facilities for hot water showers should be provided in ratio of one shower per twenty persons. Where a swimming pool is used, showers should be convenient to the pool.

D. A central sanitary facility with hot water, showers, lavatories, toilets (and laundry facilities for staff) should be be conveniently located. Other toilets and facilities for personal cleanliness should be located from 75 to 150 feet from sleeping quarters:

1. Showers must be provided in the ratio of one shower head for twenty persons. Privacy must be provided by curtains and/or partitions.

2. Toilet facilities must be provided in the ratio of one seat for ten persons. Toilet stalls must be equipped with doors or curtains to insure privacy.

3. There should be separate sanitary facilities for counselors.

4. There should be toilet and shower facilities for men.

5. There should be shower facilities near the pool and toilet facilities near any swimming area.

6. All facilities should be well ventilated, well lighted, and screened.

V. GARBAGE AND RUBBISH DISPOSAL

A. Garbage and rubbish cans must be fly-tight, non-absorbent, water-tight, emptied, cleaned, and disinfected daily. They should be kept on a raised screened platform which can be cleaned easily.

B. The disposal of garbage and rubbish from main camp and out-post units must conform to state and/or local regulations.

VI. SEWAGE DISPOSAL

A. Facilities for liquid waste must be located, constructed, and maintained according to regulations of health departments which have jurisdiction over the camp area.

B. Latrines of whatever type must be fly-tight. The ratio must be one seat for ten persons. Pit-type latrines should have self-closing lids.

C. Latrines, toilets, septic tanks, cesspools, and other places of waste disposal must be located so that underground water supplies, lakes, and streams are not contaminated. Location must be approved by state and/or local health authorities.

VII. HORSES

A. Quarters for horses must be located at least 1500 feet from camper living quarters, cooking or dining areas, and water supply sources.

B. Stables must be clean at all times.

C. Horses should not be permitted access to central camp or swimming area.

HEALTH

I. HEALTH PROGRAM

A. Personal cleanliness, provision for which should include hot water showers and hand-washing facilities near latrines, dining, and sleeping quarters.

B. Careful regulation of program tempo to avoid over-fatigue:

1. Actual swimming limited to thirty minutes.

2. Participation in activities limited to guard against over-exertion and fatigue and geared to age level of campers.

3. Precautions against overexposure to sun, heat, cold, and against altitude reactions.

C. Provision in the camp schedule for adequate rest -- at least one hour during the day for all campers and staff; a minimum of 10 hours' sleep for younger campers, 9½ hours for intermediate campers, 9 hours for older campers, and 8 hours for staff.

II. MEDICAL EXAMINATIONS

A. Campers:

1. Each camper must have a complete medical examination within one year prior to going to camp by a physician licensed to practice medicine unless the parent or guardian presents a notarized statement that such is contrary to personal conviction and releases the local council and Camp Fire Girls, Inc., from any liability arising out of failure to have a medical examination.

2. A detailed record of the complete examination must be entered on the medical examination section of the health blank by the physician.

3. Each camper, upon arrival at camp, must have a check-up by a physician licensed to practice medicine or a registered nurse, or licensed practical nurse, or a graduate nurse. The medical examination report and health history should, if possible, be in the hands of the camp director for study prior to the girl's arrival at camp. If this is not possible, the reports must be presented upon arrival at camp.

B. Staff:

1. All staff members must present a record of complete medical examination given within six months by a physician licensed to practice medicine. This should include date and result of a chest X-ray or a negative tuberculin test given within the past year.

2. At the time of signing contract, a health history signed by parent, legal guardian, or family physician must be presented. Health history may be signed by the applicant, if over 21.

3. A check-up upon entering camp.

C. Food service employees must present, in addition to B, above:

1. A food handler's permit (less than one year old) where required locally.

2. Record of negative stool within three months, according to local laws, in case of a history of typhoid or persistent diarrhea.

4. Evidence of freedom from acute colds, "flu" and skin diseases (such as boils or pustular eruptions). There should be continuous observation for such things and a check at least weekly during the season by a physician licensed to practice medicine or a registered nurse.

III. HEALTH SERVICES

A. A registered nurse, or licensed practical nurse, or a graduate nurse eligible for registration must be in residence on the camp site:

1. She must be responsible for carrying out a positive health program as a part of the total camp program.

2. She should participate in pre-camp staff training; discussions and demonstrations on total health program, counselors' responsibilities, and health and safety practices on all out-of-camp trips.

3. She must function under written standing orders from a physician licensed to practice medicine.

4. She should inspect campers on opening and closing days, and staff upon arrival.

5. She should make provision for and keep a record of daily health check of the camp, including sanitary facilities, food service facilities, and sleeping quarters.

6. She must retain in her care and administer all medications including those brought to camp by campers and staff. Such medications should be kept under lock.

7. She must maintain complete records of all treatments, on individual health forms.

B. The staff must include a substitute nurse or a person(s) holding current ARC Instructor's or Advanced First Aid certificate, to function during any absence of the camp nurse.

C. Transportation must always be available for emergency and there must be ready access to a telephone.

D. Arrangements to serve the camp must be made with a nearby physician licensed to practice medicine.

E. Clearly understood arrangements with the nearest hospital must be made in writing through the physician serving the camp concerning the admission of emergency patients.

F. Written plans must be made in advance to handle emergencies such as occurrence of a contagious disease, serious accident, or emergency operation. In case of serious accident or epidemic the Camping Department, Camp Fire Girls, Inc., should also be notified immediately.

G. Counselors must have sufficient knowledge of first aid procedure to handle emergency situations until service of nurse can be secured. Reports of all first aid given must be made promptly to the nurse.

H. Medical reimbursement insurance including illness must be carried for all campers and staff.

I. Complete and careful records of health histories and all treatments given during the camp season must be kept at camp.

IV. FOOD SERVICES

A. Meals must provide an adequate amount of good quality food and must meet nutrition and cleanliness requirements.

B. Meals prepared by campers on cookouts must meet standards of nutrition and cleanliness.

C. All meats used must be federally inspected.

D. Milk must be pasteurized and provided by an accredited source according to state regulations.

E. Milk must be served at the table from original containers not larger than two-quart size.

F. Other milk products, such as ice cream or cottage cheese, must be provided by accredited dealers.

G. If dried milk is used, it must be prepared and handled in sanitary manner.

SAFETY

Camp authorities must be thoroughly familiar with, and comply with all state laws and regulations relating to safety. Staff and campers must be safety-conscious at all times.

I. PROGRAM ACTIVITIES

A. Swimming:

1. All swimming pools and waterfront areas must be under the direct supervision of a person holding a current Water Safety Instructor's Certificate from the American Red Cross.

2. In addition to the waterfront director, there must be at least one qualified assistant (currently certified Life-saver) for every group of ten swimmers or ten participants in watercraft activities.

3. Swimming areas must be divided for swimmers of varying abilities, and clearly marked with flags, ropes, or other devices.

4. Overcrowding of the swimming area must be avoided.

5. Check and buddy systems must be in force in all swimming areas with the addition of boat patrol in natural areas such as lakes or rivers.

6. Pools must be properly fenced and entrance gates kept locked except during periods when a member of waterfront staff is on duty.

7. Visitors must not be permitted to use swimming or boating facilities at any time.

8. Lifesaving equipment must be kept in perfect order at all times and be quickly and easily accessible.

9. Surfaces of docks, diving boards and floats must be covered with nonskid paint or material and kept in a safe condition.

10. Watercraft must be kept in safe condition and must be properly equipped.

B. Boating:

1. Use of watercraft must be restricted to areas which can be kept under constant observation while in use.

2. Watercraft must not be loaded beyond capacity.

3. There must be a system of checking in and out, showing at a glance what watercraft are out and what individuals are using them.

4. All use of watercraft must be restricted to those who can swim well enough to take care of themselves in case of capsize or other emergency.

5. Non-swimmers (if wearing lifejackets) and novices may use or go in rowboats with at least one Senior Lifesaver in each boat.

6. State boat licensing regulations, where applicable, must be complied with.

C. Riding:

1. Specific areas (corrals and riding rings) and trails for riding must be properly located and identified with a view to the safety of all campers.

2. There must be a sufficient number of instructors to insure adequate supervision of all riders -- a minimum of one counselor to four riders.

3. Campers must have written permission from parents for riding.

4. Horses must be selected and assigned in relation to ability of riders.

5. Tack and other equipment must be in safe condition at all times.

6. Every protective measure must be taken to guard against accidents in stables, corrals, rings, and on trails.

7. Smoking must not be permitted in stables.

D. Hiking:

1. At least two counselors experienced in outdoor living skills must accompany campers on hikes and trips, and a ratio of at least one adult to eight girls must be observed.

2. A person qualified to administer first aid must accompany each trip and a first aid kit must be a part of the equipment and, in areas where necessary, a snake bite kit must be included.

3. If swimming is included in program, there must be American Red Cross Water Safety Instructors or Senior Lifesavers in charge, in ratio of one to ten swimmers. Use of any watercraft must be governed by safety regulations in force in camp.

4. Physical condition of campers and staff must be carefully checked by the nurse before participation in long hikes or trips. Checks by staff at frequent intervals during the trip or hike are advisable.

5. The camp director or program director must have, in writing, the proposed overnight stop(s) for an out-of-camp trip.

II. FIRE PROTECTION

A. Regular periodic inspection of buildings, grounds, and equipment must be made by a qualified authority. Immediate correction should follow any recommendations.

B. All heating and cooking installations must meet the approval of fire safety officials. Chimneys and fireplaces must be properly built and inspected annually. Stovepipes must be properly installed. Screens must be provided for fireplaces and spark screens for chimneys. Stoves must be kept free from grease.

C. Adequate exits, as required by law, and outside fire escapes on buildings of more than one story must be provided and kept free from obstruction.

D. All electric wiring and light fixtures must be installed in accordance with the National Electric Underwriters Association Code, approved and inspected at least yearly before camp.

E. Containers for gasoline, oils, paints, etc., must be clearly labeled and properly stored in a locked, well-ventilated building at a safe distance from main camp buildings. Such flammable material must be used only by authorized adults.

F. Smoking must be confined to designated places, and visitors should be warned of the hazards of indiscriminate smoking in camp.

G. Permits for open fires and incinerators must be secured where required.

H. Adequate fire-fighting equipment must be provided and must be periodically inspected to assure its constant readiness for use. Suitable equipment must be readily accessible in all areas of camp.

I. Procedures must be set up for fighting small fires, and camp staff must be trained in the use of all fire-fighting equipment.

J. Plans must be made in advance and practices held for evacuation of camp in case of fire (also for flood, windstorm, or other emergency). Any plan must contain provision for more than one exit from the camp. Such plans must be in writing.

K. Arrangements must be made for public fire protection from nearest community.

III. MECHANICAL EQUIPMENT

Boilers, motors, stoves, bottled gas equipment, automobiles and tractors must be inspected regularly, kept in good repair, and operated only by qualified persons.

IV. POISONS

Insecticides, germicides or other poisonous substances must be clearly labeled and properly stored away from food, in a place accessible only to authorized persons.

V. TRANSPORTATION

A. All camp vehicles must be maintained in safe condition and good repair. They must meet all safety tests required by state and/or local regulations.

B. Vehicles must be operated only by persons properly licensed (chauffeur's license if required).

C. Passenger-carrying liability must be carried on all vehicles transporting campers or staff.

D. Vehicles used for transportation of passengers should be fully equipped for that purpose. If trucks are used, safe seating must be provided with standing prohibited. Open or flat bed trucks should not be used.

E. There should be adequate supervision in transportation units. In a transportation unit which carries six or fewer passengers, one adult is required. Units which carry 6-15 passengers, a ratio of 1:8 in addition to the driver. Units with 16 or more passengers require a ratio of 1:15 plus the driver.

F. Each transportation unit must carry adequate first aid equipment.

G. Buses used in transporting campers must be properly licensed, authorized to traverse routes used, and adequately insured. Only buses owned and operated by reputable firms or individuals and with responsible drivers must be used.

H. Vehicular traffic over camp roads must be strictly controlled for safety in camp. Adequate parking areas for staff and visitors' use should be located away from program and living areas so roads will not be blocked.

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GROUP CAMPING STANDARDS

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PROGRAM

1. Program must relate to the needs, interests and abilities of the girls.

2. The girls should share in the planning, execution and evaluation of the group camping experience.

3. The program should be so planned and carried out that the unity of the group is preserved and strengthened.

4. There should be individual attention for each girl.

5. The camping program should provide a growth experience for girls that would include:

   - wholesome and constructive fun
   - new experiences in outdoor living
   - participation in planning
   - sufficient rest and quiet
   - an unpressured atmosphere free from physical and mental fatigue
   - a progression in outdoor activities.

6. There must be variety and opportunity for adventure and new experiences.

7. Program must be related to the appreciation and enjoyment of the outdoors and to the wise-use of natural resources.

8. There should be use of the natural environment in the development of activities.

9. There must be flexible planning and free time for spontaneous activities.

10. There should be good conservation practice; including the maintenance and improvement of environmental quality by leaving sites, etc. in better condition than found.

PERSONNEL

1. The group leader, assistant leader or sponsor must accompany the group on all camping experiences. At least one adult accompanying the group, preferably the leader, must be adequately prepared through a training course in group camping to lead the group in this experience.

2. At least two adults should accompany any group except Horizon Clubs with extensive camping experience, where the council might reduce or eliminate this standard.

3. Adult participation must be in the following ratio of adults to girls:
   Blue Birds 1 - 6 **Adventure 1 - 8** **Discovery 1 - 8**

4. A.R.N., L.P.N., Graduate Nurse, a Physician, or an adult who has completed A.R.C. First Aid Training within the past five years must accompany all groups.

5. All swimming programs must be supervised by a 21 year old American Red Cross Water Safety Instructor. Senior Life Savers must be on duty at a ratio of one for each ten swimmers.

6. All small craft activity must be directed and supervised by a Red Cross Small Craft Instructor, or a person with comparable experience and training in water safety and boat and canoe handling.

ADMINISTRATION

1. All groups must file trip plans in advance with the council.
2. All groups must file a trip report at the conclusion of trips with the council.
3. There should be sound financial planning and realistic budgeting practices in preparation for such a camping experience.
4. There should be a delegation of responsibility on the part of the adult leadership.
5. There should be girl planning and girl direction of the camping program.
6. There should be adequate insurance on persons and property.
7. There should be evaluation by both the girls and the adults.
8. There should be communication with parents and permission from the parents for girls to participate in a group camping experience.
9. There should be a plan for serious accidents or emergencies.
10. There should be records kept of accidents and illnesses, and a report made to the council.
11. Unless it is a council-owned or council-operated site, choice of site must be cleared with the Group Camping Committee.
12. Advance written permission from council and owner to use private property, including agreements as to use, care and restrictions, should be secured.

HEALTH

1. There should be plans made in advance for possible emergencies.
2. There should be an awareness of the pace of the program in order that campers are not unduly fatigued.
3. There should be nutritious food prepared under sanitary conditions and properly cooked.
4. There must be adequate rest in relation to the ages and physical needs of the girls.
5. There should be adequate sleeping area provided in order that girls might be at least six feet between head distance from each other in any enclosed building.
6. Provision should be made for adequate cover in case of inclement weather.

SANITATION

1. There must be measures taken to insure a safe water supply, both for drinking, swimming and just messing around.
2. There must be adequate sanitary facilities properly maintained to serve the number of campers and adults.
3. There must be adequate storage and refrigeration of foods.
4. There should be sanitary practices in personal matters as well as in the general appearance of camp site, food preparation and facilities.
5. There must be compliance with local regulations and with good health, conservation and environmental practices in the disposal of both solid and liquid wastes.

SAFETY

1. A.R.N., L.P.N., Physician or adult who within the past five years has completed the American Red Cross First Aid training should administer all first aid.

2. There must be a first aid kit readily accessible.

3. There should be clearly defined rules and regulations related to safety that girls understand and can implement.

4. Site should be relatively free of natural hazards.

5. There should be sufficient supervision at all times to insure safety.

6. There should be compliance with all state, local and Federal laws related to water activities.

7. There should be compliance with all state, local and Federal laws related to transportation.

8. There should be good conservation and safety practices as related to fire building and fire sites, and compliance with all state, Federal and local laws.

9. There must be a plan designed to deal with all emergencies.

10. There must be adherence to all rules of safety as they relate to any special programs such as: swimming, riding and boating, etc.

11. All equipment used must be in a safe condition.

12. The site must offer privacy and adequate protection from intrusion.

A CAMP FIRE PHILOSOPHY OF CAMPING

Camp Fire Girls, Inc.
4601 Madison Ave.
Kansas City, MO 64112

A CAMP FIRE PHILOSOPHY OF CAMPING

We believe that:

Camping is the very normal extension in the out-of-doors of Camp Fire Girls small, group-centered program. It is also a unique educational and recreational experience for girls. The outdoor environment reinforces the Camp Fire approach to working with girls. A Camp Fire camp is any place a group of girls with mature leadership have an organized, outdoor experience in group living. It may be a group campsite in a park, a day camp on a farm, or a council-owned resident camp.

We believe that:

The basic strength of Camp Fire Girls program anywhere, and under any circumstances, is the unique characteristic of the small group and of the attention provided for each individual girl. The program is an overt effort to confront the great variety of individual differences in a loosely structured, child-centered way. It is a concerted effort to help a girl grow to womanhood through her own experiences. Camping is no different. It, too, must emphasize the small group; the individual attention; the acceptance of difference; the loosely structured, child-centered approach.

We believe that:

A Camp Fire Girls camp is a microcosm in which all the elements of life are intensified by the total environment. It is a place where optimum conditions for learning to live with oneself and with others can be created. It is an outdoor learning laboratory with unique opportunities for girls to understand their relationships with their environment (A Camp Fire Girls camp focuses on the creative enrichment of the individual.) It is an oasis for children and adults; a land of fun and adventure and learning where great depth of understanding can grow from the simple experiences of living.

OBJECTIVES FOR CAMP FIRE GIRLS CAMPING SERVICES

Camp Fire Girls Camping Services have been based upon the objectives of Camp Fire Girls, Inc., a primary guide in working with children, youth and families. These camping objectives serve as the basic rationale for a camping program. These objectives apply equally to group, day and resident camping.

Appreciation of the Out-of-Doors – being aware of man's relation to the earth; conserving and using wisely natural resources; respecting the natural order of the universe; finding joy in the simplicity of nature; delight in the sensitivity to the out-of-doors.

Health, Fitness and Leisure – developing the total person to meet the rigors of modern life; being sensitive to health and safety fundamentals; being constructive and using fully one's play and work time; discovering joy, balance and renewal in life.

Physical, Mental and Emotional Health – appreciating the inter-relationship of body, mind and spirit; sharing in experiences that will help one meet developmental needs at various age levels; striving for security and acceptance; acquiring motor coordination; gaining a desire to learn and finding a temporary refuge from the pressures of daily living.

Development of Skills – affording opportunities for personal achievement of creative skills particularly related to the outdoors; releasing individual human potential for recreation; self-expression and discovery of talents.

Ability to Work and Play with Peers – providing small group experiences to test values and beliefs under the guidance of understanding leadership; learning respect and tolerance for differences in ideas and values; seeing oneself reflected in others; recognizing the importance of fair play and justice.

Democratic Group Living – participating actively and responsibly in the give-and-take of the intimate camp living group; sharing in the daily chores and duties of community living; gaining practice in decision-making; setting group values and learning to respect persons of other races, religions, or cultures.

Concern for Others – providing opportunities to express love and trust; appreciating the needs of those less fortunate; being sensitive to the roles and responsibilities of adults, peers and younger children; developing sensitivity toward major social programs; demonstrating selflessness and sacrifice, serving with and for others.

Development of Spiritual Values - gaining strength from and feeling for the deep meanings and values of life; working for the greatest good for all; appreciating the religious heritage and position of different faiths; translating convictions into active concerns.

Individual Growth and Development – seeing oneself reflected in others; learning to make decisions; building a self-concept; appreciating and understanding one's own strengths and weaknesses.

A CAMP FIRE GIRLS CAMP IMPLEMENTS THE BASIC PHILOSOPHY OF THE ORGANIZATION

The spirit of the Camping Objectives and the point of view of Camp Fire Girls about camping experiences for girls is reflected in the series of statements on the following pages.

If you believe that people are more important than things:

- employ only sensitive, compassionate and intelligent staff who can listen to girls and relate to them; the primary skill being in human relations.
- spend more of the camp budget on qualified camp staff and less on equipment and supplies; no camping experience is any better than the staff who provide it.
- develop activities that are youth-centered, not just skill-centered.
- give the staff and campers time to get to know each other by allowing them to spend maximum time together in a small, group-centered program.
- build camp buildings for girls, not for architectural awards.
- allow girls to be different, to be free to renew themselves.
- make the first commitment to children, not convenience, schedules or self-interest; a camp does not exist for these things, it is for children and, thus, it is unique if you allow them the opportunity to share in their world, its greatness, dangers, successes and failures.

If you believe that doing is as important as winning:

- provide creative, non-competitive programming where the doing of a project deserves merit, rather than deciding which one is best.
- stimulate seeing and hearing by providing night hikes, nature adventures with plants and animals, and experiences which can be had nowhere but at camp.
- allow spontaneous activities by groups to break the barriers of the clock and schedules; fun is a goal, not a byproduct.
- avoid pre-planning schedules; train adults in the skills needed to assist a group in establishing their own goals and making their own decisions.

- allow the staff to do anything with girls that is within the bounds of safety and sanity regardless of how "far-out" it might be.

- provide program opportunities by staff, letting campers plan program.

- value the simple, unsophisticated activities of camping, rather than developing elaborate, perhaps boring activities programs.

If you believe that living with others is exciting:

- create a living community where interaction is free.

- provide time for campers to live together, not just sleep in the same room.

- allow girls to talk freely without somebody policing their every word.

- allow older girls to have time alone, individually and in groups.

- provide time for discussion and debate about the real problems girls face in our society; create an atmosphere of openness.

If you believe that knowing oneself is possible:

- allow each camper free time every day.

- allow each staff member free time every day.

- allow a girl to do nothing, or a group to do nothing, or a whole camp to do nothing if that is what they want.

- provide time for personal and individual conversation.

- encourage reading, art, drama and music as normal extensions of childhood and self.

- provide an atmosphere where thinking is as important as doing, and contemplation is as significant as the backstroke.

If you believe that learning is fun:

- recognize the value of "learning by doing" and give personal commitment to this principle which allows campers to make decisions.

- provide the opportunity for campers to get out of buildings and away from nature displays.

- provide opportunities to participate in developing usable and relevant camping skills.

- stress getting acquainted with nature and respecting it as one would a friend. A person known only by name, escapes the memory; but when one knows that person's dislikes, likes, where he lives, how he looks, he may become a friend forever. So it is with nature. Make plant and animal identification by name only superficial.

- allow time to enjoy being in a beautiful place, to gaze at sunsets, to marvel at the wonders of life, to seek answers to the web of life.

- provide opportunities, not classes, where learning takes place out of need and interest, e.g., if a canoe trip is planned, learning to canoe properly becomes essential.

- practice sensible site conversation, leave animal and nature species in the environment, avoid polluting water and air, see the interrelations of man to his environment.

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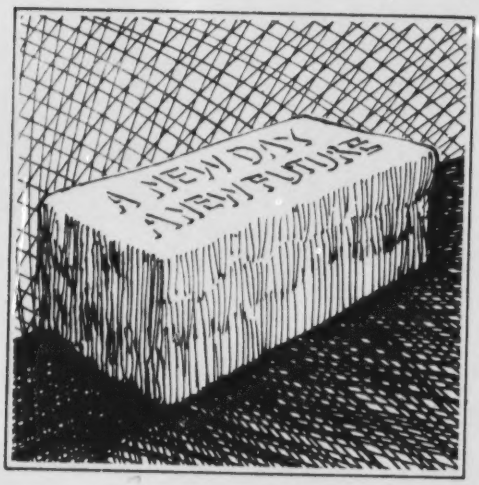
Tradition And Transition



Camp Fire is offering commemorative bricks representing the brick building which is becoming the new corporate headquarters of Camp Fire Girls, Inc. in Kansas City. An artist's conception of the brick is pictured on the preceding page and on the cover. Donors to the Capital Campaign can symbolically "build headquarters" through their contributions. The paperweight size red bricks inscribed with the campaign logo and clearly identified with Camp Fire will be available for $10 each only during the Capital Campaign. The bricks can be obtained through the Youth Division or campaign headquarters at 4601 Madison Ave., Kansas City, Mo. 64112 or, in some cases, through the local Camp Fire council office.

Art Direction: Ron Garnett
Editorial Direction: Shirley Montague
Photography: Dale Monaghen and
Camp Fire Councils and archives

An Annual Report

Camp Fire celebrates the completion of a challenging year of transition to new services, new structures and to a new corporate location. At the same time it has preserved the tradition of leadership, individualism and warm companionship that has made Camp Fire unique in the years since it was founded by Charlotte and Luther Gulick in 1910.

This has been a time of carrying forward the philosophies of the past, making adjustments to the needs of the present, and building bridges to an exciting future.

We laid the cornerstones of our New Day program, which was adopted by our National Council in 1975. We undertook a strenuous corporate move, launched our first major capital fund-raising campaign and implemented a complete structural and programmatic reorganization.

Our New Day research told us that Camp Fire is needed in more areas—by more people—than ever before. With the implementation of New Day we have been meeting those needs, innovatively, in the Camp Fire tradition.

When Camp Fire was founded its program concept was aggressive and progressive. The fashionable bustle was discarded, in favor of practical clothes for camping. Girls were given the opportunity to explore, to create, to develop, to have fun in ways that previously were limited only to boys. Camp Fire's program helped prepare them for a future as responsible, self-directed women.

Today Camp Fire is determined to continue this tradition of helping young people develop into achieving adults who feel responsible to their country and to other human beings, who have the skills needed to function successfully, who can actively influence the decisions that affect their own lives.

It is your support and concern that helps us build upon the past as we create a meaningful New Day for the future. You are helping us make Camp Fire increasingly relevant and result-oriented, helping us to serve people of all ages—female and male. This Annual Report is dedicated to you in gratitude and continued hopefulness.

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The National Executive Director

We are experiencing a great sense of rejuvenation within Camp Fire.

We have come so far this past year! We have grasped the challenges we set for ourselves, and we are experiencing a great sense of rejuvenation within Camp Fire. In essence, our New Day transition is a regeneration of Camp Fire's history—the vision Dr. Gulick fostered in the organization from its beginning—a vision demanding that Camp Fire be capable of renewal in order to meet ever-changing needs. Our progress represents the active strength of Camp Fire today. Our transition into New Day is a story of Camp Fire's struggles, its setbacks, its successes. Most of all, Camp Fire today is a story of what people can do for themselves and others when they do it together. We are stretching our capabilities and experiencing the joy of our reawakening.

Hester Turner

Dr. Hester Turner
National Executive Director
Camp Fire Girls, Inc.

The President

Camp Fire people are carrying us forward to an expanding role of leadership . . .

Camp Fire's most precious asset has always been the dedicated people in this organization—young, old, all races and creeds. Today as in the past, Camp Fire people are carrying us forward to an expanding role of leadership among youth organizations of America. What of Camp Fire's future? Certainly tough problems remain both at the National and local levels—finances and people-power come quickly to mind. But these problems will be faced and conquered. New Day allows the people of Camp Fire the freedom to attain difficult, demanding goals. The future holds no limits except the ones Camp Fire people choose to set for themselves.

Martha P. Burk

Mrs. Jack S. Burk
President
Camp Fire Girls, Inc.

The Chairman

"Responsive and progressive" are the words that characterize our directors over the past year.

"Responsive and progressive" are the words that characterize our directors over the past year. During this implementation period the Board has reviewed, defined and revised where necessary the policies and standards that form the basis of Camp Fire quality control. In giving direction to the management and operation of Camp Fire, directors have shown special concern for the needs and rights of all individuals at all levels. With the accomplishments of the past year as our encouragement, the Board will continue to stress creative leadership as well as wise corporate planning.

C. E. Woodcock

Clifton E. Woodcock
Chairman
Board of Directors
Camp Fire Girls, Inc.

"Camp Fire's role is to provide alternatives so youth can follow the traditional path or learn how to carve out their own."

Los Angeles Herald Examiner

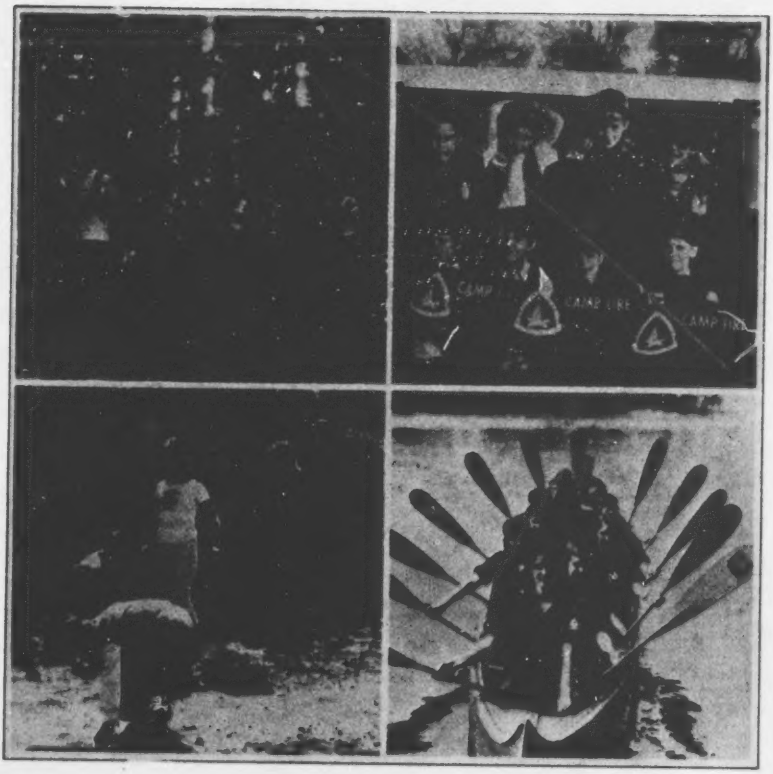
Camp Fire has always been a trail blazer in the introduction of a full range of role options for young women and the reduction of sex stereotyping. Although we still place our main emphasis on helping young girls realize their fullest potential as caring, self-directed individuals, Camp Fire Girls, Inc. isn't just for girls anymore. Camp Fire is for everybody.

Infants, senior citizens and all members of a family or community are now participating in traditional and newly-designed Camp Fire activities. Boys are involved in Camp Fire across the country. They are integrating well into our programs. Camp Fire now assists young people from a variety of backgrounds with a wide range of interests. We are helping them to develop a strong sense of their own identity and purpose.

We are excited and encouraged by the progress being made by our councils as they begin to implement New Day. It is working! One of the most exciting findings is that Camp Fire is reaching more youth than in previous years. We are reversing the downward trend in membership that has been a major concern to virtually all youth organizations. Camp Fire can report a marked *rise* in members across the country in councils offering New Day programs.

Camp Fire is moving forward with new programs, new training and a new image. As a result of community assessments—a vital first step as councils move into the New Day program—a variety of program needs were identified. Individual youth needs include recreational-outdoor programs, the physical and emotional needs of the handicapped, employment needs of older youth, sex education, information on drug abuse and safety, special tutoring, socialization needs and preparation for adulthood. Advocacy needs point to improved supervision of children, juvenile justice, child care, improved health and safety conditions for children, problems of the poor, minority wages and sex stereotyping.

Ongoing Camp Fire group experiences continue to stress—as they have through the years—democratic decision making, planning skills, responsibility and personal development. And Camp Fire councils continue to offer



"With activities tailored for and by Camp Fire Girls across the nation, participants may discuss teen-age prostitution and pregnancy, learn mountaineering and survival or study business and budgets."

Chicago Daily News

traditional club programs grouped around age levels denoted by Blue Bird, Adventure, Discovery and Horizon.

But need assessment has resulted in many innovations in our club programs—the addition of boys' clubs (frequently called Blue Jays or Thunderbirds), Bumblebee clubs for four- and five-year-olds and coed clubs. Also, new methods of program delivery have been added to traditional methods. Camp Fire has "freed up" program possibilities. Councils now have the autonomy to meet identified community youth needs through new, exciting, relevant programs. In fact, each council may develop any program based on our standards that will further Camp Fire's philosophy, accomplish Camp Fire's purpose *and* meet the needs of youth in its local community.

Supplementing club programs are Camp Fire council programs that offer day camps in minority communities, tutorial programs, special programs for handicapped children, a six-week summer recreation program, a juvenile justice program for status offenders, a marijuana educational program, a help line to lone children, a "Safety Town" program, tennis clinics on camp sites, mini-ventures, a self-defense awareness program, a street program and day care programs for 3-to-5 year olds. Camp Fire also sponsors drop-in centers and a home for delinquent girls.

New Camp Fire projects extend far beyond the original concepts of the organization. One council has proposed hiring unemployed minorities to move into housing projects and organize and run neighborhood afternoon Camp Fire groups. (The major problem in inner city housing projects, a community assessment revealed, is that parents don't consider it safe to allow their children out at night to attend meetings.) For this project the council sought and received approval for a grant under the Comprehensive Employment Training Act (CETA), which is under the supervision of the Department of Health, Education and Welfare.

A metropolitan Camp Fire council received an $85,000 CETA grant to bus children from the inner city to the suburbs, and vice versa, in a cultural exchange. One Camp Fire council maintains a small home for delinquent

"Camp Fire is moving off Broadway in New York and onto a new stage of growth and development in Kansas City, Mo."

Seattle Times

girls aided by a CETA grant. Camp Fire also collaborates with several other youth organizations to operate a job clearing house for high school seniors. In Alaska, Camp Fire is carrying out government funded programs that teach Eskimo children nutrition, health and learning skills. Councils are reaching out effectively to a variety of groups with innovative multiple programming.

New Day provides opportunities for adults as well as youth to participate as Camp Fire members in many different ways. People can be active as club members and/or individual members who participate in council programs. Under New Day a majority of councils offer family membership plans and financial assistance covering membership dues and/or program fees for those who need aid.

New Day has introduced basic structural changes, beginning with the chartered councils. The chartered council is now a corporate member of Camp Fire Girls, Inc. with the rights, privileges and responsibilities of that membership. Local Camp Fire people are members of the chartered council and are also affiliates of Camp Fire Girls, Inc.

With the encouragement of the National organization, councils have become pioneers once again in developing successful new programs. These structural and programmatic changes have engendered more effective communications within the councils. They have heightened local awareness of lines of accountability, strengthened the role of our volunteer boards and committees, and given councils the means to do better what Camp Fire has always done best—respond to the needs of American youth.

The National organization has also made important changes. New Day momentum has carried Camp Fire Girls, Inc. nearly 1,200 miles from New York City to our new corporate headquarters building in Kansas City. Our New Day became a Great Day with the move to 4601 Madison Ave., Kansas City, MO 64112.

Camp Fire, the U.S.A.'s second largest girls' organization, is first to move its corporate headquarters to a mid-America location. This central site is expected to launch a dynamic new era in Camp Fire's continuing development.

Possession of the four-story building was celebrated March 1 in a festive ribbon cutting

"People from Kansas City... knew what Camp Fire was about. We were wanted in Kansas City."

Dr. Hester Turner, Nat'l Exec. Dir.

ceremony, with Mayor Charles B. Wheeler and other Kansas City dignitaries welcoming Camp Fire officials to our new home. In late June, just as our fiscal year was coming to an end, our National headquarters began operation in America's heartland. The corporate administrative and program offices were transferred from New York; and we consolidated the National Service Center from Englewood, Colo. Camp Fire's supply department is currently in New York; plans are underway for Kansas City relocation.

Our move really began in 1970, when 87 percent of Camp Fire's chartered councils indicated in a survey that National could serve them better if it relocated corporate headquarters to mid-America.

Thirty-eight cities courted Camp Fire after announcement of the official decision to relocate. The Camp Fire site selection committee gave consideration to 21 different cities, and the final choice was narrowed to four metropolitan areas. Any one of the four would have qualified.

Why did we finally select Kansas City? There are several obvious reasons. Kansas City's central location offers advantages for national transportation and postal services. There will be considerable savings in operating and travel expenditures, utilities and maintenance costs. Of primary importance, Kansas City gives us a corporate location within a 600-mile radius of 58 percent of our members.

One of the concerns of our Board of Directors was the self-image of the city we chose for our headquarters. We observed a confident, wholesome, vigorous quality of life prevailing in Kansas City. Also, through many discussions, we found a positive community attitude toward our goals as a national youth organization. The Kansas City area gives us 14 universities and colleges to aid Camp Fire with research and library facilities to support our program development.

Although Camp Fire today is still facing the challenges and problems of a major transition, the strong positive image of Kansas City nationally is a great advantage to Camp Fire as we complete our staff relocation and recruit the outstanding professionals needed to guide Camp Fire at the National level.

"Camp Fire is the first national youth organization to move its corporate headquarters to a mid-America location."

The Portland Oregonian

Recruitment of staff has been one of the most difficult aspects of our corporate renewal. When we moved, we lost valuable Camp Fire people—people who had given years of service to youth. It is terribly difficult to uproot people and their families from lifetime homes. With only seven National staff members to coordinate the move and begin the search for a new nationally representative staff, our progress in recruitment has been somewhat hindered. During this transitional period there's been a need for the local councils to be more self-sufficient, and to take a greater responsibility in program development.

But daily we are making strides in recruiting the appropriate highly trained National staff who will strengthen and expand National's services to councils, and in providing the supportive services to guide councils in their vitally important work for America's young people.

In addition to its need to recruit new staff, Camp Fire Girls, Inc. assumed financial burdens with the purchase and redesigning of our corporate headquarter building and the moving of corporate offices. The organization is also required to cope with the stresses of establishing new working relationships with a new staff and suppliers. At the same time we are striving to maintain our financial stability and establish Camp Fire's unique individuality as a corporation within the Kansas City business community.

Our efforts have resulted in increased professionalism in the operation of the Camp Fire organization. Much emphasis has been placed on redesigning and re-emphasizing the role of the council executive director. To ensure that all executive directors are well trained, National requires and finances Core Training. A generous grant from the Lilly Endowment, Inc., has made nationwide Core Training courses a reality.

Core Training I for experienced executive directors was held in Norman, Okla. in February 1977 with Dr. Keith Goldhammer of Michigan State University as coordinator. Nearly 150 executives spent five days training intensively in administrative and business management workshops and sessions. Although we have not completed our

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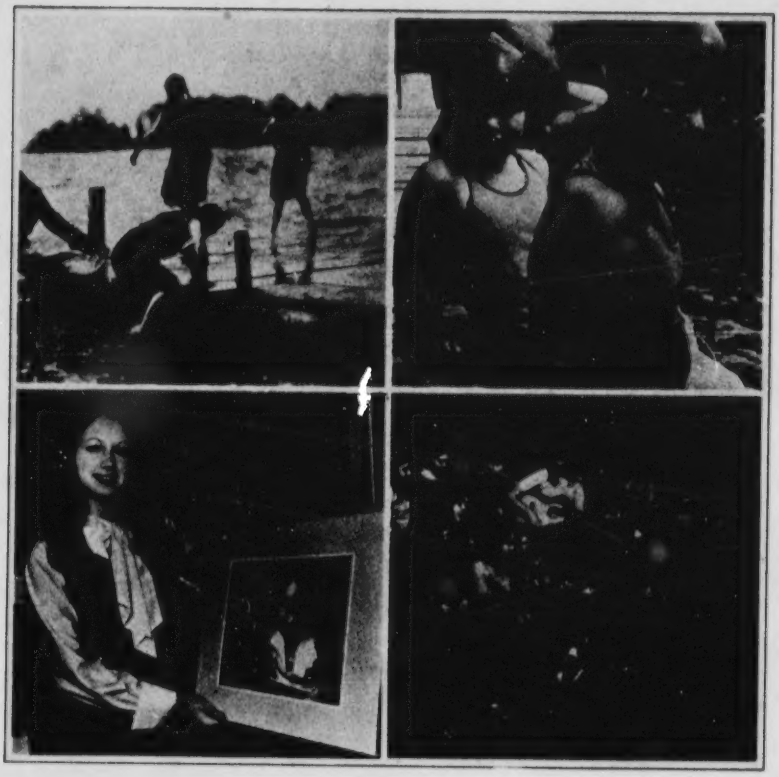


"If you're going to make a difference in the lives of young people, you have to start early."

Dr. Hester Turner, National Executive Director

evaluations measuring back-home results of Core Training, the increased effectiveness of many councils indicates already that Core Training is giving our executive directors the basic tools they need to function as skilled administrators.

Core Training II with Dr. Eva Schindler-Rainman gave intensive instruction to 54 executive directors with less than two years experience. A third Core Training will be held in February 1978. Also, a study of the qualification requirements for council executive directors is now being conducted by a task force of the National Board; councils are being encouraged to report their own experiences.

During 1977 another new step was taken to strengthen Camp Fire at the National and local levels: A professional public relations campaign has been launched in conjunction with the international public relations agency, Carl Byoir & Associates, Inc. The goal is to increase public understanding and support of Camp Fire's unique services to society. The media have responded with enthusiasm, nationally and in many hundreds of local communities.

Public service announcements have been distributed to radio and television stations. In several of these spots Dinah Shore, a former Camp Fire Girl, urges young people to become part of Camp Fire—"the nation's most exciting youth organization." Says Ms. Shore, "I was a member of Camp Fire, and I know what a difference it can make in your life." Also, for the first time, Camp Fire announcements received endorsement from the Advertising Council and were highlighted in the council bulletin.

A newsworthy art exhibit at Crown Center in Kansas City, "The Quartet of Art Media" was sponsored by National featuring prize-winning art works by Camp Fire members from past years in photography, painting, printing and fibers. Highlighting the show were top photographs from the 1976 Camp Fire art contest sponsored by the Eastman Kodak Company. National news coverage included reprints of the photographs in more than 1,200 newspapers, and numerous articles across the country featured individual Camp Fire winners.

Nationally and locally, Camp Fire has worked actively with other organizations and with governmental agencies on matters

"Getting the public to see Camp Fire as a credible source of new programs for youth was our greatest success during New Day implementation."

President Module I Council

affecting today's youth. We met with influential officials at all levels, including the staff of President Jimmy Carter.

We also cooperated with religious groups on further development of church-related program opportunities. The Church Commission on Scouting has now changed its name to the Church Commission on Civic Youth Agencies; it is working closely with Camp Fire on the creation of a new "God and Country" series.

Other activities include participation by Horizon Club members in career conferences and survival training courses sponsored by the United States Air Force and support of the No Greater Love organization's "Salute to Hospitalized Veterans."

Camp Fire continues its participation in the annual Colgate-Palmolive "Help Young America" campaign, involvement in "Keep America Beautiful," work with the American Camping Association on issues affecting the camping movement and quality of camping, and cooperation with the National Safety Council in the development of Camp Fire safety programs.

Under a grant from the Law Enforcement Assistant Administration, Camp Fire and other youth agencies are working in five locations to reduce, prevent and interrupt the cycle of juvenile delinquency.

Involvement with the Center for Youth Development and Research of the University of Minnesota in the National Youth Worker Project, sponsored by Lilly Endowment, has provided the opportunity for many council members to attend training sessions aimed at improving services to teenage girls with varied needs and problems.

Participation in the National Collaboration for Youth is another instance of Camp Fire cooperation with other agencies for the benefit of young people. Camp Fire is an active participant when the national executive directors of the top 17 national agencies meet twice yearly with the United Way of America to discuss mutual concerns; after several years of study and effort, a draft of a statement on relations between United Way and the agencies has achieved sufficient approval to be sent to many councils in draft form.

The 1976 annual meeting of Camp Fire Girls, Inc., was held in our new 13 zones. In addition to a discussion of corporate reports,

"As a city with a firm record of supporting youth agencies, Kansas City is pleased and proud to welcome the Camp Fire Girls."

Kansas City Star editorial

zone participants heard the report of the National Services Committee, held lively discussions concerning proposed zone organizational plans, elected zone officers and youth advisors to Congress, and discussed objectives for consideration by the 1977 Congress. The newly elected 13 zone chairmen became directors of the Board of Directors of Camp Fire Girls, Inc. for the 1977-79 term.

The National organization has budgeted funds to staff a Washington office to effect representation at the national level and to keep councils informed about opportunities and pending legislation.

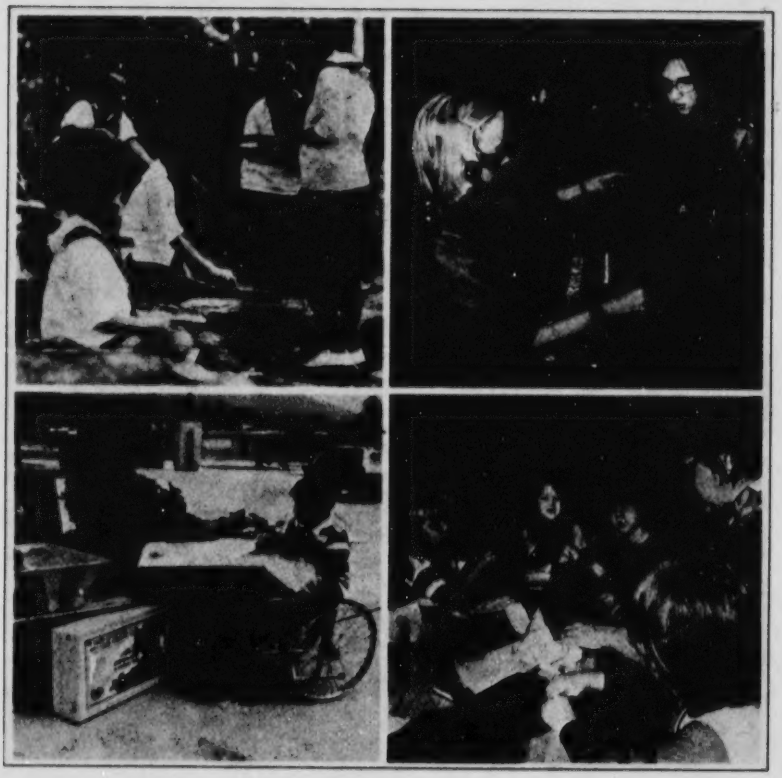
The National staff has also been augmented with a well trained volunteer staff. Our volunteer effort has been refined and strengthened to assist effectively with New Day transition. Untold hours of dedicated work by Camp Fire volunteers has sustained us as we rebuild our staff in Kansas City and restructure our organization under New Day. Camp Fire volunteers are given serious responsibilities and well-earned respect. They reflect the commitment and professionalism that extend through all segments of the Camp Fire organization, with a steady flow of two-way communication between National and local Camp Fire participants.

Commitment has also come from outside our Camp Fire family.

A $25,000 gift from our largest corporate contributor, the Colgate-Palmolive Company, and the receipt of the largest grant ever received by Camp Fire—$161,200 for executive training from the Lilly Endowment, Inc. of Indianapolis— highlight our list of financial contributors who are making Camp Fire's New Day program a reality. More dollars are needed to continue the thrust of New Day.

To reach our goal of financial stability and strength we have launched Camp Fire's first nationwide Capital Campaign, provided fund-raising assistance to councils through training and consultation by the National staff, and implemented the New Day charter fee system revising the division of income between local councils and National.

To defray the costs of relocating staff and hiring and training new staff in the Midwest,



"The decision to purchase our new National headquarters building presents...a unique opportunity. We've got to make it happen. It will require money."

Donald D. Buchanan
Chrm.Capital Campaign Steering Comm.

Camp Fire is informing the country that—for the first time in our history—we are actively seeking financial support.

In conjunction with our corporate decision to move to Kansas City, a broad-based fund-raising drive has been set in motion by the Camp Fire Capital Campaign Steering Committee.

On March 1, our expanded Financial Development Department officially moved into our new corporate headquarters in Kansas City; and on May 21 the Capital Campaign was launched at a meeting of the Board of Directors.

Initially, we need to raise $2,498,530. These dollars will enable us to purchase our new corporate headquarters, bring in needed equipment and most important, provide the means to implement the most advanced programs in the history of national youth agencies.

"A New Day—A New Future" became the motto on our campaign newsletters, and people began to hear about our efforts. The Capital Campaign involves three major areas of emphasis, for a total of $1,745,000:

The Kansas City Effort has an objective of $800,000 to be raised in our new National headquarters city to help support our move;

The National Effort concentrates on selected large corporations in America, with a solicitation objective of $570,000 and

The Camp Fire Effort depends on the personal contributions of friends, family, members and alumni of our organization. Through a campaign structure, we hope to provide everyone with an opportunity to contribute financially to our New Day program. The family goal is $375,000.

Much groundwork has been done to help councils improve their fund-raising skills. Council fund-raising courses and workshops have been conducted by National specialists, and literature and services have been provided.

We are on our way to making it happen. Our Capital Campaign efforts had already raised $450,000 from contributors at the close of our fiscal year. In addition, some $750,000 has accumulated in a special fund from the sale of our former New York City headquarters building. This fund had been set

"We are looking. We are reaching and we are, as a consequence, more aware of opportunities."

Executive Director Module I Council

aside to help pay the costs of our move to mid-America.

Although we are halfway to our initial fund-raising goal, support is still urgently needed. It is Camp Fire's aim to reach all potential donors with our New Day message, stressing the importance of funding our programs for today's youth and tomorrow's leaders.

Camp Fire wants to help overcome the shocking "Gender Gap" in funding of America's youth organizations. On a national scale, for every dollar donated to boys' groups only 33 cents is given to girls' groups! This country's largest fund-raising charitable organization allocates 35 percent less to girls' groups than to boys' groups, and national corporations on the average give girls less than one-half of one percent of their charitable donations. Most amazing of all, perhaps, is the fact that American women, ranging from homemakers to corporation executives, themselves contribute overwhelmingly more to boys' groups than to girls.

Amazingly, Americans who contribute to the interests of their sons, husbands or fathers have failed to recognize the funding needs of today's girls and tomorrow's women. They have failed to understand the necessity of supporting programs that help girls develop healthy self-concepts, strong character and useful skills.

Camp Fire wants to help change the societal attitudes that produce these funding inequities. In the meantime, it needs money to remain alive and active as an organization, so that it can make a difference in the development of our future leaders, future spouses, future parents, future citizens of a changing world.

Camp Fire is preserving worthwhile tradition while undergoing crucial transition. Camp Fire has dared to undergo a complete corporate renewal in order to put its New Day beliefs into action. Your ideas and support will continue to be activated, gratefully and energetically, for the benefit of *all* our children.

Contributors
SUPPORTING MEMBERSHIP
As of June 30, 1976

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Charlotte, North Carolina

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Kansas City, Missouri
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New York, New York
United Missouri Bank of Kansas City
Kansas City, Missouri
The Raymond John Wean Foundation
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Memorial Funds

In Memory of Edith Kempthorne
In Memory of Mrs. Gertrude A. Rands
In Memory of Cleo Stewart
In Memory of Mr. Harold Winer
In Memory of Janet McKeller

60 gifts from local units to the Edith Kempthorne Fund

Camp Fire Girls, Inc.

BALANCE SHEET
June 30, 1977

ASSETS		CURRENT FUNDS Unrestricted	LIABILITIES AND FUND BALANCES		
Cash		$ 31,289			
Cash in savings account		809			
Marketable securities, at cost (market: $12,788)		15,588	Accounts payable and accrued liabilities		$ 305,917
Accounts receivable for merchandise, less allowance for doubtful accounts of $15,000		115,999	Notes payable to bank (Note 5)		250,000
Uniforms and other merchandise inventory, at the lower of standard cost (approximates actual) or market		466,924	Due to other funds		97,425
Prepaid expenses and other assets		58,489	Total liabilities		653,342
Notes receivable		22,500	Commitments (Note 4)		
Deferred catalogue expense		—	Fund balances (Note 1):		
Prepaid pension expense		8,009	Designated by the Board for:		
Due from other funds		202,411	Endowment fund	$116,550	
Board-designated:			New council fund	20,316	
Cash	$ 96,192		Scholarship fund	8,214	
Certificate of deposit, at cost plus accrued interest (approx. market)	12,303		Capital fund	86,115	231,195
Commercial paper, at cost plus accrued interest (approx. market)	27,045		Unrestricted, available for general activities		233,124
Marketable securities, at cost (market: $74,648)	115,801				
Due from other funds	3,097		Total unrestricted fund balances		464,319
Other	1,205	255,643			
		$1,117,661			$1,117,661
		Restricted			
Cash		$ 8,259	Deferred income		$ 78,303
Commercial paper, at cost plus accrued interest (approximates market)		9,955	Due to unrestricted funds		177,963
Grants receivable		107,466	Fund balances (deficit) (Note 1):		
Other		91	Relocation and housing fund	$(79,932)	
Due from unrestricted funds		69,880	W. R. Grace fund	6,761	
			Lilly fund	12,556	(60,615)
		$ 195,651			$ 195,651
		FIXED ASSET FUND			
Land, at cost		$ 253,984			
Building and improvements, at cost less accumulated depreciation of $10,444		1,002,113			
Furniture, fixtures, equipment, and leasehold improvements, at cost less accumulated depreciation and amortization of $237,842		20,875	Accounts payable		$ 57,100
			Mortgage note payable (Note 5)		529,441
			Fund balance (Note 1)		690,431
		$1,276,972			$1,276,972

See accompanying notes.

Statement Of Public Support, Revenue And Expenses And Changes In Fund Balances

Year ended June 30, 1977

	Current funds			Fixed asset fund	Total all funds
	Unrestricted	Board-designated	Restricted		
Public support and revenue:					
Public support:					
Contributions	$ 51,877	$144,988	$100,396	$ —	$ 297,261
Royalties	211,755	—	—	—	211,755
Total public support	263,632	144,988	100,396	—	509,016
Revenue:					
Membership dues and charter fees (Note 6)	1,332,874	—	—	—	1,332,874
Conferences and workshops	29,401	—	—	—	29,401
Gross profit on sales of uniforms and other merchandise inventory (net of cost of sales of $857,384)	549,285	—	—	—	549,285
Dividend and interest income	1,718	7,320	29,630	—	38,668
Rental income	34,235	—	—	—	34,235
Other	10,194	—	26	—	10,220
Total revenue	1,957,707	7,320	29,656	—	1,994,683
Total public support and revenue	2,221,339	152,308	130,052	—	2,503,699
Expenses:					
Program services:					
Service to local units	1,019,927	—	104,389	1,091	1,125,407
Personnel and training	158,670	2,451	—	216	161,337
Research and development of programs	93,252	—	—	382	93,634
Merchandise service	468,488	—	—	491	468,979
Total program services	1,740,337	2,451	104,389	2,180	1,849,357
Supporting services:					
Management and general	740,930	887	186,667	13,551	942,035
Fund raising	94,489	59,138	—	165	153,792
Total supporting services	835,419	60,025	186,667	13,716	1,095,827
Total expenses	2,575,756	62,476	291,056	15,896	2,945,184
(Deficiency) excess of public support and revenue over expenses	(354,417)	89,832	(161,004)	(15,896)	$ (441,485)
Other changes in fund balance	1,012	—	(680,000)	678,988	
Fund balances, beginning of year	586,529	141,363	780,389	27,339	
Fund balances, end of year	$ 233,124	$231,195	$ (60,615)	$680,431	

See accompanying notes.

Statement Of Functional Expenditures

Year ended June 30, 1977

Funds	Program services		
Unrestricted	**Service to local units**	**Personnel and training**	**Research and development of programs**
Staff salaries and employee benefits	$ 537,563	$112,843	$72,085
Professional and consulting fees	42,021	3,843	—
Data processing	34,326	—	—
Travel	150,462	13,513	7,808
Telephone and telegraph	29,295	2,663	1,535
Supplies and office expenses	15,757	3,598	2,788
Publication and printing	61,885	345	5
Publicity and promotion	48,301	903	—
Postage and shipping	24,689	2,310	3,520
Educational materials	7,435	162	226
Occupancy	58,678	16,803	4,950
Subscriptions and dues	738	1,072	283
Grants	7,500	—	—
Interest expense	—	—	—
Miscellaneous	1,277	615	52
Total unrestricted	1,019,927	158,670	93,252
Board-designated			
Fund raising expenses for capital fund	—	—	—
Scholarship grants and aids to councils	—	2,451	—
Miscellaneous	—	—	—
Total board-designated	—	2,451	—
Restricted			
Workshop grants and expenses	104,268	—	—
Relocation expense (including professional fees, travel expense, and salaries)	—	—	—
Miscellaneous	121	—	—
Total restricted	104,389	—	—
Fixed assets			
Depreciation and amortization of fixed assets	1,420	283	497
Gain on sale of fixed assets	(329)	(67)	(115)
Total fixed assets	1,091	216	382
Total expenses	$1,125,407	$161,337	$93,634

See accompanying notes.

Merchandise service	Total	Supporting services: Management and general	Supporting services: Fund raising	Supporting services: Total	Total expenses
$290,432	$1,012,923	$442,990	$ 64,634	$ 507,624	$1,520,547
5,400	51,264	48,187	—	48,187	99,451
30,241	64,567	9,530	—	9,530	74,097
13,000	184,783	60,408	13,638	74,046	258,829
3,920	37,413	12,415	2,899	15,314	52,727
8,654	30,797	21,536	4,560	26,096	56,893
1,080	63,315	2,827	339	3,166	66,481
33,189	82,393	26	—	26	82,419
19,682	50,201	11,248	1,683	12,931	63,132
—	7,823	45	111	156	7,979
56,188	136,519	87,847	5,111	92,958	229,477
20	2,113	6,672	756	7,428	9,541
—	7,500	3,750	—	3,750	11,250
—	—	29,275	—	29,275	29,275
6,782	8,726	4,174	758	4,932	13,658
468,488	1,746,337	740,930	94,489	835,419	2,575,756
—	—	—	59,138	59,138	59,138
—	2,451	—	—	—	2,451
—	—	887	—	887	887
—	2,451	887	59,138	60,025	62,476
—	104,268	—	—	—	104,268
—	—	186,667	—	186,667	186,667
—	121	—	—	—	121
—	104,389	186,667	—	186,667	291,056
6,39	2,839	14,490	213	14,703	17,542
(148)	(659)	(939)	(48)	(987)	(1,646)
491	2,180	13,551	165	13,716	15,896
$468,979	$1,849,357	$942,035	$153,792	$1,095,827	$2,945,184

Notes To Financial Statements

June 30, 1977

1. Basis of financial statements

Camp Fire Girls, Inc. (the Organization) is in the process of relocating its corporate headquarters and supply division (New York City) and national service center (Denver) to Kansas City, Missouri.

Current funds—Unrestricted

Unrestricted, available for general activities

This fund is used to carry out the purposes of the Organization as described in the certificate of incorporation and as directed by the National Board of Directors (the Board).

Board-designated

Board-designated funds are unrestricted contributions or income which the Board has segregated forthe purposes described below:

- The endowment fund investment income is used, after Board approval, for special undertakings designed to maintain the excellence of the Camp Fire Girls program and the skills of its professional and volunteer leadership.
- The new council fund organizes and provides financial assistance to new councils and includes monies raised and to be expended for special programs for regions.
- The scholarship fund provides advanced education and training for members of the local and national professional staff.
- The capital fund consists of the proceeds of a nationwide campaign in 1977 for the purpose of relocating the national headquarters. Contributions,including those from pledges are recognized in the financial statements at the time monies are received. Pledges of $208,000 were outstanding at June 30, 1977. These pledges will be realized as follows: $79,000—1978, $65,000—1979, $52,000—1980 and $12,000 thereafter (unaudited).

Current funds—Restricted

- The national headquarters relocation and housing fund, established from the net proceeds of the 1971 sale of the national headquarters property, is restricted for the relocation of the national headquarters.
- The W. R. Grace fund consists of a grant from the W. R. Grace Foundation, which is to be used to prepare a definitive history of the Camp Fire Girls since 1960.
- The Lilly fund consists of grants from Lilly Endowment, Inc. which are used to support training programs for chartered council directors. Grants are recorded as deferred income when received and recognized as income in the financial statements to the extent that reimbursable expenses are incurred.

Fixed asset fund

- The Organization's land, building, improvements and equipment are carried at cost fn the fixed asset fund. Depreciation and amortization of the building, improvements and equipment are provided on a straight-line basis over the estimated useful lives of the assets.

2. Pension plan

The Organization has a contributory Deposit Administration Group Annuity Policy providing benefits on retirement, death and disability for all eligible employees. The termination subsequent to June 30, 1977 of a significant number of employees because of relocation resulted in the immediate vesting of their pension benefits. After giving effect to the termination, the actuarially computed value of all vested benefits exceeded fund assets by approximately $123,000; it is intended that the excess will be funded over the next five years. Pension expense for 1977 was $76,000, which represents normal costs and amortization of past service cbsts. It is the Organization's policy to fund, at a minimum, pension cost accrued.

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3. Federal income taxes

The Organization is a tax-exempt organization under Section 501(c)(3) of the Internal Revenue Code and accordingly is not subject to income tax. The Internal Revenue Service has determined that the Organization is not a private foundation as defined by Section 509(a) of the Internal Revenue Code.

4. Lease commitments

The Organization leases office facilities for its national headquarters and national service center at annual rentals of $117,000 and $28,000, respectively, under leases expiring November 30, 1979 and June 30, 1978. The Organization, however, has obtained the right to terminate the lease for its national headquarters as of July 31, 1977. Additionally, the Organization leases warehouse facilities at an annual rental of $36,300 through April 30, 1979, and $40,000 through April 30, 1980 with the right to cancel as of April 30, 1978 or 1979. Rent expense for the fiscal year 1977 was approximately $186,200.

5. Notes payable to bank

The Organization's notes payable mature in November 1977. Interest on the notes outstanding at year-end, which are unsecured, is payable monthly at the bank's prime rate plus 2% (8 ¼% at June 30, 1977).

On March 1, 1977, the Organization entered into a loan agreement with a Kansas City bank whereby the Organization may borrow up to $1,400,000 for the purposes of relocation and purchase and improvement of property in Kansas City. The note is secured by a First Mortgage Deed of Trust on the property and an assignment of the capital fund pledges and rents from tenants in the Kansas City building. The note is payable on demand beginning March 1, 1978 but no later than January 1, 1983. Interest is payable quarterly at the bank's prime rate plus 1% (7¼% at June 30, 1977).

6. Membership dues and charter fees

In September 1976, under the "New Day" program, the Organization began changing from the individual membership system to a system where each local council is a chartered council of the Organization, and an annual fee for each corporate member is based on local membership and gross operating expenses. The transition is beginning with the largest councils and is expected to be completed by September 1978. Revenue from the new program, which is included in membership dues and charter fees, amounted to $835,496 in 1977.

Accountants' Report

The National Board of Directors
Camp Fire Girls, Inc.

We have examined the accompanying balance sheet of Camp Fire Girls, Inc. at June 30, 1977 and the related statements of public support, revenue and expenses and changes in fund balances and of functional expenditures for the year then ended. Our examination was made in accordance with generally accepted auditing standards, and accordingly included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

In our opinion, the statements mentioned above present fairly the financial position of Camp Fire Girls, Inc. at June 30, 1977, and the results of operations and changes in fund balances for the year then ended, in conformity with generally accepted accounting principles applied on a basis consistent with that of the preceding year.

September 16, 1977 **Arthur Young & Company**
New York, New York

Camp Fire Girls, Inc., Board of Directors

As of June 30, 1977

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Department of Agricultural
Economics
Oregon State University
Corvallis, Oregon

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Loyola University
Stritch School of Medicine
Elmhurst, Illinois

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Southwestern Bell Telephone
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Executive Vice President
Secretary
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Kansas City, Missouri

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Executive Director
Seattle-King County Council of
Camp Fire Girls
Seattle, Washington

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Albuquerque, New Mexico

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Camp Fire Girls, Inc.
Albuquerque, New Mexico

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Assistant Cashier (retired)
Rainier National Bank
Yakima, Washington

The purpose of Camp Fire is to provide, through a program of informal education, opportunities for youth to realize their potential and to function effectively as caring, self-directed individuals responsible to themselves and to others; and, as an organization, to seek to improve those conditions in society which affect youth.

(Adopted November 22, 1975)

Ms. COUTELLIER. Through its professional training for camp directors and in workshops for boards of directors and camping committees, the Camp Fire Girls, Inc., standards are reinforced and interpreted. Local boards and staff are responsible for the implementation of those standards in their camps. In each and every instance of camping and outdoor activity, safety standards are an integral part of the training and education of the adults and youth involved in the programs.

Because the philosophy of Camp Fire Girls Inc., camping is child centered rather than activity centered, we believe that our organization evidences in its safety practices a regard for the well-being of children unparalleled in the field. We are not only concerned with health, safety, and sanitation, but with the atmosphere of living that evidences concern for people. In such an environment, safety of a physical kind is inherent.

Our concern if camping is to become legislated is that it is done in the best interest of children and in such a way that it is reasonable and protective of children while at the same time encouraging the type of educational outdoor experience identified in "Camp Fire Philosophy of Camping."

We support youth camp safety legislation because of our concern for all children in all camps of whatever persuasion and leadership.

Camp Fire Girls Inc., concurs with the American Camping Association and urges adoption of the H.R. 6761 or the amendment of the S. 258 to conform with the recommendations submitted. As in the past, Camp Fire Girls, Inc., will continue to offer its resources in an effort to develop and implement Federal youth camp safety legislation that is in the best interest of children.

Senator CRANSTON. Each of you has indicated that you support the intent of youth camp safety legislation.

Do you mean by that statement that you believe there is a need for Federal legislation in this area?

I would like to ask each of you to answer that yes or no, if you can.

Mrs. ABRAMS. Well, the Girl Scouts of the U.S.A., of course, support all efforts that will increase youth camp safety, but to say that Federal legislation will be the answer, we are not prepared to say.

Senator CRANSTON. How about you?

Mr. CHRISTOFERO. The Boy Scouts would rather see the States do it, but the States have not shown a lot of progress and we feel that there has got to be some kind of legislation to guarantee safety for kids in camps and so, therefore, as we have before, we support it.

Senator CRANSTON. You support Federal legislation?

Mr. CHRISTOFERO. We supported the House bill last year.

Ms. COUTELLIER. Likewise, Camp Fire Girls Inc., would support Federal legislation to protect equal protection to all children in all camps.

Senator CRANSTON. You believe there is a need for it?

Ms. COUTELLIER. Yes.

Senator CRANSTON. Mr. Christofero, continuing to you, you indicate in your statement that the Federal Government should emphasize and encourage States to enact and promulgate their own youth camp safety statutes and regulations.

How should this encouragement be shown?

Mr. CHRISTOFERO. I would think that one thing to perhaps be a little more assertive with the regulations, the suggested regulations that were developed by HEW. A lot of camping people have made contributions into that document and States could be encouraged through that means and more education as to the operation of some sort of youth camp safety law in the States.

Senator CRANSTON. If a State fails to enact State laws, do you support direct Federal intervention, such as proposed by S. 258?

Mr. CHRISTOFERO. Yes, we supported it in the House bill and we support it here.

Senator CRANSTON. You state in your testimony that, "Proper consideration should be given to adequate selection, training, and orientation for those who would be inspecting the camps."

Do you mean that in terms of Federal legislation or in terms of State legislation?

Mr. CHRISTOFERO. Well, Senator, I guess I would mean that in terms of any legislation, because if you are going to inspect camps and license and inspect camps, the people who are going to conduct those inspections need to understand camping and what is required as well as understanding the bill.

That is where we have a concern about somebody going in and inspecting a camp and really not knowing what they should be looking for.

Senator CRANSTON. Do the others of you have any feeling on that particular point?

Ms. COUTELLIER. I agree with the statement.

Ms. ROSS. I am not sure that you are aware, Senator, of the incredible numbers of camps in existence which are not located on permanent sites, how day, trip & travel camps move, that a camp could be in one place for 1 or 2 days and then move on to another place.

It might be difficult for the Federal Government to intervene and be effective when a State does not act in many, many cases. I only share that with you for your basic understanding of the nature and scope of the work which could lay ahead for the Federal Government.

Senator CRANSTON. Thank you very much.

Mr. Christofero, you conclude by indicating that you cannot support S. 258 as it is now written because it does not provide for State or Federal youth camp advisory boards.

Do you have any other reservations about this legislation or would you support that bill if advisory boards were added to its provisions?

Mr. CHRISTOFERO. No. I think that is the only one.

Somebody handed me a copy of this bill dated January 14, 1977, in which it does indicate that it would provide for State advisory boards and it is my understanding that that has been pulled out of it.

As far as we are concerned, in support of this bill, that is one of the key measures as to whether it would provide a State advisory board as well as a Federal.

Senator CRANSTON. What information do you provide to the parents of prospective campers with respect to the safety of your camps?

Mr. CHRISTOFERO. Mainly our camp brochures that are mailed out to parents in that, first of all, our staff people are qualified and trained, that our waterfront people, rifle range people, those particular skills are also qualified and trained both by American Red Cross or our National Aquatic Schools.

Senator CRANSTON. Do others of you want to comment on that particular question?

What information do you give parents?

Ms. COUTELLIER. Parents do receive a camp brochure indicating the qualifications of the staff, including a registered nurse on the site at all times, and other special qualifications such as waterfront positions.

Mrs. ABRAMS. Girl Scouts of the U.S.A. sends to the 349 Girl Scout councils its booklet "Safety-Wise," and every troop gets one of these free of charge.

Senator CRANSTON. Thank you.

I would like to ask you, Ms. Coutellier, do you believe it is appropriate for the Federal Government to be involved in direct enforcement of youth camp safety standards or direct inspection of camps as provided for in S. 258, or under any other specific circumstances?

Ms. COUTELLIER. No. I think that would be the position of the State in that if there were minimum Federal regulations required of each State, then the State advisory board would implement that inspection within the State.

Senator CRANSTON. Under 258, those that did not submit an acceptable plan would be subject to inspection by the Federal Government in States where there is no appropriate plan?

Ms. COUTELLIER. No, we do not support that.

Senator CRANSTON. You do not?

Thank you.

Mrs. Abrams, some opponents of youth camp safety legislation have expressed concern over the potential costs of compliance and additional people work and redtape that is often associated with Federal regulation.

Do you share those fears?

Do you feel that some increased costs could result in some Girl Scouts being unable to attend camps?

Ms. ABRAMS. No; Senator Cranston, because we are already doing it.

Senator CRANSTON. How do the Girl Scouts "Safety-Wise" standards differ from the HEW model legislation?

If you want to provide that for the record rather than verbally.

Ms. ABRAMS. Yes; I will be happy to.

[The following was received for the record:]

The Girl Scout camping standards set forth in safety wise parallel those developed by the Department of Health, Education and Welfare. They cover all the same health and safety points as well as additional program material. In some instances, such as the ratio of adults/girls, the Girl Scout standards are much higher than the HEW standards.

Senator CRANSTON. Thank you very much.

That concludes my questions to you.

You have been very helpful and thank you for being here.

Our next witness is Mitch Kurman, Westport, Conn.

I just noticed that there is a roll call vote going on. I am afraid I better suspend and go over to that.

We will have to suspend temporarily. I will be back as soon as possible.

Please forgive the inconvenience.

[Recess.]

Senator CRANSTON. The hearing will please come to order.

I apologize for the delay.

We now will proceed with our next witness, Mitch Kurman of Westport, Conn.

Senator Riegle has a number of written questions for you, Mr. Kurman.

We will give them to you and you can respond in writing to them.

We have immense time problems, so I would appreciate your being brief.

I know your feelings on this subject and I do want to give you an opportunity to present what you feel necessary.

STATEMENT OF MITCH KURMAN, WESTPORT, CONN.

Mr. KURMAN. Austin Luffman, of North Carolina, lost his boy at a camp. He wrote, "Mitch, I wish you luck in Washington. I am sick and tired of beating my head against a brick wall." His son died after 19 months in a coma from permanent brain damage due to delay in getting him out of the pool. Two camp lifeguards were poor swimmers. Luffman's attempt to get safety legislation in North Carolina failed. This comment reflects the despair that nothing can be accomplished against organized camps—or other groups—who maintain constant pressure in Washington. Camps are organized, our children are not. I am a businessman, and I know how pressure works for or against laws, but we must draw a line. This involves the health and safety of children.

This law is needed. This is not rhetoric. The problem applies to all. I met with Congressman Carl Durham's son-in-law after the Congressman's grandson was killed at a YMCA camp in North Carolina. Such a meeting is more persuasive than any testimony.

Some say camp safety should be handled by the States. Fine. If it were there would be no need for today's hearings. Only a mere handful have acted. Comprehensive laws exist in Michigan, Connecticut, New Jersey, and Colorado. The New York and California laws can easily be improved. Based on benefits from their camp laws Michigan, New Jersey, and other officials strongly support this law. Dr. Ellen Fifer, assistant commissioner of Health of Minnesota, realizes Minnesota laws are inadequate, and she wants this bill. Charlotte Williams, project director for Cordura Corp. who did HEW's camp study, testified that with very few exceptions State laws and regulations relating to camp safety were grossly inadequate and do not provide the type of protection that parents have a right to expect when they send their children to camp.

Virginia delayed a bill to license camps by putting it in their legislative "study" stockpile.

I just learned the bill was killed.

In Maryland the only chance the youth camp bill had was if its sponsor Lucille Maurer ignored camp owners who favored the bill and emasculated the law to please powerful camp organizations. She refused this dangerous and deceptive tactic and withdrew the bill. Some Maryland Boy Scout groups, whose own national office testified repeatedly for the Federal bill—with the proviso that they preferred it at the local or State level—led the fight against the State bill. The Massachusetts bill of Lois Pines met a similar fate.

In Maine, where canoeing attracts some 25,000 per season, a canoe safety act was voted down by the legislature. Maine citizens and newspaper editorials wanted a canoe safety law after some 23 campers and their counselors were rescued last summer when their canoes capsized in 4-foot or 5-foot waves on Lake Mooselookmeguntic, a large treacherous lake. Volunteers in power boats almost lost their own lives in the rescue. Two weeks later another camp canoe group of eight was rescued on this same lake. At public hearings of the Fisheries and Wildlife Committee there was strong legislative support. However, the Maine Boy Scouts, whose own literature would dictate endorsement, stated they "did not know whether they could support it." Later the bill was killed in the legislature. The opposition was led by house member Curran who is director of a Maine Boy Scout camp. Senator O'Leary commented on the injustice of not reporting in the press the drowning of a Boy Scout; instead two boys were shown receiving Scouting's highest award in the rescue.

In Oklahoma in 1977 three Girl Scouts were raped and murdered. Oklahoma requires only sanitary inspection; there is no licensing. No legislation is pending since this triple rape and murder. Statistics and records do not exist. Prior to the tragedy law officers knew a dangerous person was in the area. In 1976 a male intruder entered a tent at night at this Girl Scout camp and fled. In April 1977 an effigy of a man hanging from a tree was discovered by Girl Scout campers. In spring 1977 a note threatening the murder of campers was found at the camp. On opening day of camp in 1977 a tent wall was found slashed and was hastily repaired by camp personnel before campers arrived.

Precautions should have been taken but were not. In a lawsuit by the parents of one of the slain girls, it was charged that "Camp Scott did not comply with standards of accreditation of the ACA and the Girl Scouts of America." It is not unusual for a national organization to make no effort to enforce their standards. This emphasizes the need for this law. The National Girl Scouts were criticized for their failure to issue a strong public stand on the murders.

Mayes County Sheriff Pete Weaver denounced the National Girl Scouts' failure to mount a nationwide reward drive to catch the killer. Sympathetic citizens in Leesburg, Fla., led by a grocer, Ron Palmer, raised $3,000 for the reward fund. Mr. Palmer's pleas to the National Girl Scouts to join in a reward fund drive were rejected.

A vicious tactic in this fight is the so-called religious issue. I believe that this was initiated by self-serving camp operators. They realize that religious opposition would be more effective than camp opposition. Professor Luther Adams, head of comparative religion at

Harvard, described this as an old tactic of self-interest groups—it is a red herring. On the other side the Lutheran Church, the Catholic Youth Organization, the Unitarian-Universalists, the United Methodist, the Mormons, the Christian Scientists, the National Council of Jewish Women, and many others all support the bill in letters to me and in articles and editorials in their publications. For emphasis, the bill forbids interference in religious teachings. It only applies to safety.

Opponents say it will create another big government bureaucracy. This is false. Each State will administer the law.

Statements that children are safer at camp than at home or school are deceptive. The HEW study only had camps that volunteered. Less than half of these filed a report. Schools must keep records; camps in most States need not. I have proof of children severely injured, even killed, and public relations of the Scouts, YMCA, et cetera, kept it out of the press.

Opponents say regulations will increase costs to put them out of business. These include camps for disabled and disadvantaged. There should be no double standard for safety. The Salvation Army has many camps to serve the disadvantaged, and they support this bill. Disabled children certainly need every safety precaution. A mentally retarded boy drowned because he had no life preserver in violation of the law, and a blind boy drowned due to insufficient personnel.

Dr. Thomas A. Stein, representing the National Easter Seal Society for Crippled Children and Adults with nationwide camps, gave his organization's support for this bill.

The National Safety Council, the PTA, the National Recreation and Park Association, the American Society of Pediatricians, and others also strongly support this. I emphasize these organizations have no financial interests in camps—their concern is safety for children.

I believe in good camps. I sent my youngest child to camp for three summers after the death of my son. It will take this legislation to create a wholesome atmosphere to benefit camps and reassure parents. Our children's safety versus some camp pressures should be put in its proper perspective.

Examples and criticisms were cited primarily to show what must be corrected. I maintain public relations is not a substitute for law.

I wish you would ask any questions you want, Senator.

Senator CRANSTON. Thank you.

It is forceful testimony.

I know how dedicated you are to achieving legislation that will meet the need and I admire your diligence and determination and I understand the personal tragedy that led you to have insight into this problem.

I want to assure you that we are committed to finding appropriate ways to protect all of the children in this nation from needless harm

I hope that we will manage to find steps that can be helpful and that are appropriate.

In regard to the work that you have done, how effective have these State laws been in the handful that have adopted meaningful laws?

Mr. KURMAN. In effect, where a law has been adopted as meaningful, it has been very effective.

I will give you specific examples also in the State of Connecticut. We got a simple life preserver law passed; the boating fatalities dropped from 20 to 11 within 1 year.

I worked with Boating Magazine, April 1970, and with Senator Magnuson to get the Recreational Boating Act of 1971. That has not put any burden on the boating industry, it has benefited from it.

There are 400,000 more boats now than when that law passed. There are additional statistics because of the additional boats but fatalities have dropped by a dramatic 9 percent. I feel pretty good about that, it is just a small example, of how a law has worked where it has been effective to save lives and benefit all.

Senator CRANSTON. Do you have any statistics for various States on the effectiveness of youth camp safety legislation?

Mr. KURMAN. Well, in the State of Connecticut, where we have a law, and it is a good law, it is an effective law, and I am proud of it, and the people there are proud of it, the camp people, the camp operators, themselves realize it is a good thing, they are now advertising in the New York Times magazine section—where there are at least 10 full pages of advertising every week—the benefits of a Connecticut camp where an effective camp code protects children. Parents and the public want such assurance and the Connecticut law has helped both the public and the camp industry.

There are advantages of sending a child to camp in Connecticut, which has one of the few laws in the United States, and it has certainly benefitted the public and the Connecticut camps.

Our statistics show it. I can get you statistics from the Department of Health. I do not have them at my fingertips.

Senator CRANSTON. Would you supply for the record any statistics that you have on Connecticut and on any other States on what happened before and after the passage of youth camp safety legislation, not boating but youth camp safety legislation.

Mr. KURMAN. I will be glad to do so.

[The following was received for the record:]

ADDITIONAL MATERIAL SUPPLIED BY MR. KURMAN

Connecticut officials were able to *stop* a camp "franchise" arrangement—from another State (New York), from misrepresenting its facilities when in reality they simply attempted to use Connecticut State parks without any facilities of their own (their literature was misleading). Other similar misrepresentations were not allowed in Connecticut due to lack of basic equipment and qualified personnel. The element that was prone to tragedies, to hurt the public and the many fine camps in the State, have been eliminated from the camp industry in Connecticut. The same element that was stopped because of law in Connecticut operated in New York State without restraint and dissatisfied parents had problems with both the Better Business Bureau and the Attorney General's Office when they tried to get refunds.

In New Jersey officials found camps grossly substandard according to their New Jersey camp code—a Burlington County Y.M.C.A. camp drowning led to a crackdown by New Jersey officials to close at least five camps in Southern New Jersey. The camps got the message and problems of the past hardly exist for a safer, more wholesome camp situation to benefit all. New Jersey officials are happy with the results. They testified for the "Federal Youth Camp Safety Act."

[Further materials submitted by Mr. Kurman, including numerous newspaper excerpts, are maintained in the Subcommittee file.]

Senator CRANSTON. Do any State laws require the collection of data?

Mr. KURMAN. Connecticut does, yes. Michigan does, too.

Senator CRANSTON. What does that data reveal?

Mr. KURMAN. The data reveals the accident, type of accident, also there is another aspect to this thing.

They are quite firm in insisting that proper personnel are employed. When I say proper personnel, I mean somebody at the waterfront who is a "waterfront safety instructor," not merely someone who knows how to swim.

I understand your colleague, Senator Hayakawa, is a member of a scuba diving team or club, which is fine. I am in favor of it. I think it is wonderful.

However, one of the editors has been very helpful to me. He had to withdraw his child from a scuba diving camp because the scuba diving camp, that was advertised as a scuba diving camp, had *no* scuba diving instructor.

It is hard to imagine anything more dangerous than that.

Senator CRANSTON. It has been suggested that a certain percentage of the tragic camp accidents are probably due to what can best be characterized as poor judgment on the part of camp supervisors and employees.

How do you respond to the criticism that you cannot legislate against those types of accidents?

Mr. KURMAN. I am delighted that you asked that question, Senator.

To give a very, very personal answer, I have the documentation, it is in your file.

In the case of the death of my boy, the Rochester, New York YMCA had the children led down a very dangerous area in Ontario, Canada. They smashed two canoes. One boy's leg was almost broken. My boy wrote me a letter saying he doubted that they would do that stupid stunt again. We did not get his letter until after he was killed on their next trip to Maine.

The camp simply said they lost their clothing overboard on the 1st (Canadian trip).

The very first day in Maine, where they assured us they knew the water, the leader, who I consider a young fool, I have no animosity other than that, led the boys down a logging sluice, that the Great Northern Paper Company will not let their own personnel on.

It is too dangerous. They shoot 180,000 cords of logs down there and they tumble end over end. The leader smashed his canoe and my boy smashed his. My boy was killed. It took 3 days to find my son's body. Great Northern Paper Co. closed down a 2000 man 24 hrs. per day huge mill at tremendous cost to help us. Meanwhile, the Rochester, New York, YMCA instructed their leader to get out of there and get out of there fast. They again let him continue on to New Hampshire. In New Hampshire he again endangered the children on a trail in Mt. Washington that was considered too dangerous by the Appalachian Mountain Club. To change leaders would admit guilt.

Luckily, nothing happened on the trip.

There is too much money involved in this thing. It is about time people put this thing in its proper perspective.

The Scouts get roughly 17 percent of the United Funds. As far as I am concerned, if these young children need it, I want them to have it. But I do not want them to have it by reason of public relations to hide things.

Now, that was just one example. I have plenty of them. In the case of Luffman's boy, I mentioned——

Senator CRANSTON. How can legislation be devised that would deal with the judgmental failure?

Mr. KURMAN. It is not a judgmental failure. When you have a leader who has never been to that river before; ignores the warnings of the Maine Forest Ranger, ignores the warnings of the entire Ontario Provincial Police, and I have a copy of that, too! It is not a judgmental factor when you have people on the waterfront who are not qualified to save a child . . . who are poor swimmers with no ability to save a child and no knowledge of what to do with a victim once they get him or her.

They may know how to swim, but they would not know what to do when they bring him in.

From your own State of California, a gentleman, Mr. O'Keefe, sent a letter to me, his child was killed in Arizona on the Gila River. They floated the kids down on innertubes. When they questioned the counselors in charge, what did they do when they saw a child was in trouble?

They screamed! What do they do when they saw that the child was pulled under and drowned? They cried.

Did they try to give the child mouth-to-mouth resuscitation?

No, they did not know how.

The California child attending camp in Arizona died due to improper equipment and no one on a river trip who knew how to save her.

That's not "judgment"! That is crass cheating on both equipment and personnel for a potentially dangerous river trip.

What kind of person is that to have?

In the case of the Boy Scouts in Albuquerque, they took the kids through the Desolation Canyon, in southern Utah. It is one of the most fantastic and wildly dangerous places on Earth. They led the kids in on little rubber rafts. Every raft was capsized. Nobody knew what happened. Luckily, by sheer luck, because the area is sparsely populated, people almost 50 miles downriver noticed this kid, Boy Scout McCarthy, floating dead. Then U.S. Army helicopters out of Ogden Air Force Base went up and down the steep canyon walls until they found these kids. Some were actually hysterical. They never thought they would be found alive. One storm would have carried the entire troop to their death.

After that, you would think there would be a little commonsense in this thing. No!

The Albuquerque Boy Scouts took the kids 2 years later to Yellowstone Park Lake. Against warnings they were led out in homemade canoes, poorly made. The Forest Ranger warned them to avoid that lake. You cannot survive in that lake.

It is a glacier lake and it is subject to very severe mountain storms. Not one, but four, drowned in this place, including the leader who tried to clutch a child's life preserver. It was also rotten and could not hold a 50-pound boy even when new.

Later, I got a Boy Scout "P.R." statement that I was mistaken, how Scott McCarthy died in trying to save the life of a buddy, and in the Yellowstone tragedy, they died of exposure in a winter storm.

Well, the winter storm happened to be in August and it was the hottest time of the year. Of course, they died in a storm. They did die of exposure not drowning, as B.S. "P.R." said, but it was on a glacial lake impossible to survive in.

I have nothing against the Boy Scouts. As far as I am concerned, I have no interest in them. I feel these cases and others should be more than public interest. I feel our children's lives are at stake.

I think it should be the concern of the Congress to look into the Boy Scouts and other things that have Congressional charters.

Senator CRANSTON. Could you explain why, what your interpretation or explanation of why so few States have enacted laws?

Mr. KURMAN. Yes, I can very easily.

I have some correspondence here: Lucille Maurer in the Maryland House of Delegates, wrote me that the only chance she had to get a bill passed was if she "doctored" to suit the Maryland camps. She refused. In Texas, Lane Denton, of Waco, Tex., wrote me a detailed letter of how the Boy Scouts ganged up to kill a meaningful camp bill that he proposed.

He wrote me. He said, "I think that is all the more reason why that bill is necessary." Regarding the bill from Lucille Maurer in Maryland I have a copy of the Maryland bill introduced this year and some newsclippings of prior years by her in the Maryland House of Delegates.

The Maryland camp industry was supportive of the idea of camp licenseship, providing the industry had rulemaking power. The results would be a watered down bill she felt was both deceptive and dangerous.

In the State of Maine, where we just went through a "canoe safety" bill, I got this letter from the State of Maine. The bill was quietly killed. The opposition was led by a Maine State Legislator who was also a Boy Scout camp leader.

In neighboring Virginia, which is pretty close by, they proposed a simple licensure bill for camps, just a license.

The bill was also quietly killed under pressure from Virginia camp operators.

This is a part of it and this is all pressure. That is all it amounts to.

It is about time we put our ideas into proper perspective.

Is it the value of our children or the dollar bill that takes priority?

Senator CRANSTON. You may have heard me ask a witness earlier about the Heritage Insurance Co. records in San Antonio, showing the number of accident claims has decreased steadily from one in 640 days in 1967 to one in 871 days in 1976.

What are your thoughts on that?

Mr. KURMAN. Senator, you brought up a very interesting aspect of it and while I cannot answer in complete detail, I can shed a little light on it and I would love to.

In North Carolina, Prof. Joe Wall at the University of North Carolina, a gentleman who I was with, said you cannot sue a Y.M.C.A. camp in North Carolina ("charitable immunity"). In another case, I helped expose a case in Rochester, N.Y., at a Boy Scout camp. I knew nothing about it, but the press apparently heard about me and they contacted me.

I went up there and we exposed it. A kid had a knife at his throat. He was sexually abused and beaten horribly. A doctor said he never saw such a case. Well, the judge, 4½ months later—Judge Shea of Canton, N.Y., discharged a six (6) count grand jury indictment of sodomy, assault, and endangering a minor. He ruled that "a corporation cannot be given custody of the child." Lawyers I showed it to could not believe it.

In California Barbara Riegle working for a radio station, testified that she sent her child to a "Y" camp. Something like 27 kids were on a rifle range. A kid was hit and blinded in an adjoining camp.

The parents of the blind child were ignored. After awhile, they got an attorney to represent them. The attorney was no fool. He sued each and every one of the individual parents of the children on the "Y" and they collected from every one of them because he realized the difficulty of suing an organizational camp. He bypassed the "Y" camp suing the parents who are legally responsible for their children. The insurance companies have very little to lose with these organizational camps. The "deck is stacked" to favor camps, not campers.

Senator CRANSTON. Why are there less suits being filed on this matter?

Mr. KURMAN. Why are they being filed?

Senator CRANSTON. Less claims against the insurance company.

Mr. KURMAN. If you have a minor child on your hands and you are being ignored, you have to do something and eventually you turn to a lawyer to represent the rights.

Senator CRANSTON. I am trying to find if there is any explanation of why there are less claims being filed against this insurance company for camp accidents.

They are steadily declining, which would seem to indicate that there are less accidents.

Mr. KURMAN. A decline of accidents? Not necessarily. Also, in checking through the insurance forms that I got, I have got quite a few of them, that the insurance rates for the so-called institutional camps are less than they are for the private camps and I certainly feel that the reason for that is not the safety factor but the fact that in most cases you have difficulty suing a camp of that nature. Many attorneys realize the difficulty of a law suit against such camps and they decline them. A suit against a "Y" or Boy Scout camp is extremely difficult and not likely to succeed (as per some of the examples I gave you).

Senator CRANSTON. Thank you very much.

Mr. KURMAN. Thank you, Senator.

I appreciate it.

Senator CRANSTON. We now come to our final panel consisting of Dr. Ted Camp, ranch manager, Bill Rice Ranch; Edward Oulund, executive director, Christian Camping International; Jack Wyrtzen,

founder and director, Word of Life International; accompanied by George Scurlock, supervisor, central maintenance department, Word of Life.

I do have to ask you to be brief in your presentations.

If you will proceed in whatever order you see fit.

STATEMENTS OF DR. TED CAMP, RANCH MANAGER, BILL RICE RANCH; EDWARD OULUND, EXECUTIVE DIRECTOR, CHRISTIAN CAMPING INTERNATIONAL; JACK WYRTZEN, FOUNDER AND DIRECTOR, WORD OF LIFE INTERNATIONAL, ACCOMPANIED BY GEORGE SCURLOCK, SUPERVISOR, CENTRAL MAINTENANCE DEPARTMENT, WORD OF LIFE

Dr. CAMP. I am first on the list.

I am Ted Camp, representing the Bill Rice Ranch. We have a 1,500-acre Christian camp located in middle-Tennessee. We have been in operation now for 25 years.

We run approximately 13 weeks in the summer with between 400 and 1,100 campers per week. I have attached a breakdown of our total campers for the last 13 years.

Our camp is unique in that we specialize in working with the deaf of America. We have weeks in our camping program that are set aside especially for the deaf and hearing impaired. As far as we know, this is the only camp of its kind and size in the United States. We believe to attempt to totally uniform regulations across the United States would ill serve the best interests of the very campers you are trying to protect. We believe these regulations would, in all likelihood, severely and even critically hamper our operations.

We are for safety. We not only advocate this but we practice it. In the 25 years that the Bill Rice Ranch has been in operation, we have not had a single fatality accident or illness. This does not mean, Mr. Chairman, that we will not have such this coming camp season. However, we do everything in our power to safeguard the lives and well-being of our campers—hearing or hearing impaired. We cannot guarantee that we have a totally safe camp. There are many things that we cannot guarantee against. Even the Federal Government, with all the tax dollars, cannot be sure even the simplest camp will be safe and that no accidents will occur. There is no way the Federal Government can perfect legislation against thunderbolts or other acts of nature.

We feel we would be adversely affected by this legislation. One objection we have to the bill as it is drawn is that of personnel selection. I am aware of the noninterference clause in the legislation. This does not reassure us too much. We have too much record of good Federal intentions gone completely haywire. OSHA is a good recent example as well as the congressional case made for social security. The income tax is also an example of programs initiated that no one ever dreamed would have the impact on personal lives and fortunes as it does today.

As a Christian camping ministry, with our particular emphasis and unique work to the deaf, we want to have the flexibility to engage

those people whom we feel are best qualified both spiritually and technically to do the job. We feel this is not the proper place for the Federal Government to operate. We have some 75,000 people on our mailing lists and we hear from many of them regularly. From the tone of our mail, we think most of these people feel exactly the way we do about this matter.

But to a more practical point—we do not think it possible, or even likely, that the Secretary of HEW, or his staff, can, in the language of the legislation, (section 6(a)) ". . . develop, and, by rule, promulgate, modify, or revoke Federal youth camp safety standards . . ." that will be enforceable or even understandable for all the sections of the country.

I would hate to think, as manager of the Bill Rice Ranch, that our next building to be constructed would have to meet:

Air-conditioning standards suitable for southern New Mexico;

Roof load standards suitable for snowfalls in northern New Hampshire;

Insect-proof standards suitable for Atlantic City in the summer;

Wind load standards suitable for the Midwest tornado belt;

And earthquake standards suitable for southern California.

Yet, as I read the definitions within the act (Sec. 4(15)), it says youth camp safety standards include "criteria issued by the Secretary designed to provide to each camper safe and healthful conditions . . . directed toward areas (such as) building and site design . . ."

In another area, Mr. Chairman, we feel if you were to attempt to write regulations of safety which we must maintain during our weeks for the deaf for other camps, it would be far too stringent and many of our qualifications would not fit their particular case. As an example, we put more referees on the basketball floor when the hearing impaired are playing because they, of course, cannot hear a whistle and must take a visual sign to stop playing.

We station special workers at various critical points on our campground to keep the hearing impaired from taking a wrong turn and, perhaps, getting lost. You cannot simply call them back. We put extra counselors and other volunteer workers in the water with the hearing impaired when they are swimming to communicate the instructions of the water safety director. We feel these people are absolutely necessary to a safe operation.

Yet, it would be impossible to write regulations covering every situation that we are dealing with.

Finally, Mr. Chairman, we are convinced through experience that the approach intended by this bill will add to our costs and contribute nothing to our safety.

As an example, I have here a file of correspondence and related paperwork pertaining to our sewage and waste water treatment plant at the ranch.

Our camp is inspected once a week regularly and we have added announced visits. We cooperate fully with the county and State officials in all that they require. Through a casual conversation and the sending of an informal carbon from our county inspector, the State became convinced that we were planning an increase in the size of our camp far beyond the capacity of the sewage treatment facility. Ac-

cordingly, there ensued a huge back and forth paper battle. I have the remains of this battle here with me. We were not planning anything like the State was misled to believe. Our tabernacle that we use for our preaching services seats a maximum of 1,500. The State had us pegged for a tabernacle with the seating capacity of 2,500. Therefore, we were ordered to build a waste water treatment plant to accommodate this number or be shut down the next season.

Because of this, we were forced to spend some $89,000 on a facility that we did not need. The State wanted us to spend $125,000. I have since been told by other State employees in the same department that we could have added blowers to our existing plant and that would have been sufficient.

The tragic thing is, Mr. Chairman and distinguished members of the subcommittee, we have in effect squandered an amount that represents a close approximation of 2 weeks of operating budget for the deaf camps. We invite deaf young people to come to camp at no cost for housing or food. Of course, we must house them, feed them, and pay the staff plus all the other costs of running the ranch. The amount that was spent needlessly on this plant could have provided a week at camp for some 1,000 deaf children. Instead, it was literally thrown down the drain because of the overlap between the State and county officials.

For the Congress and HEW to want to add still another and more expensive layer of paper shuffling would simply mean more money would be wasted and more children would lose out on good, healthy, safe camp experiences.

There is much more I would like to say, Mr. Chairman, but I know the time of this committee is limited. I know the backers of this legislation are well intentioned, and they have the highest motives. I commend them for it. However, I must observe, if we get much more "help" from the Government in the operation of our camp, we will all go broke. We feel camping is already well covered by the law and there has been sufficient regulation. I appeal to you to let it alone.

Thank you for your attention.

[The following material was received for the record:]

Bill Rice Ranch - Camp Registration 1965 - 1977

Week	1965	1966	1967	1968	1969	1970	1971	1972	1973	1974	1975	1976	1977	Totals
Work Week #1	27	33	46	56	55	54	44	60	----	----	----	----	----	375
Work Week #2	104	76	127	127	----	75	33	----	----	----	----	----	----	542
Work Week #3	84	72	----	----	----	----	----	----	----	----	----	----	----	156
Orientation	----	----	----	----	----	----	----	----	118	44	124	110	158	554
Junior Week #1	----	----	----	----	122	268	377	438	342	141	562	398	627	3275
Junior Week #2	----	----	----	----	----	363	363	431	560	453	606	667	625	4088
Junior Week #3	----	----	----	----	----	----	----	----	----	398	----	----	----	398
Deaf Week #1	215	266	246	336	384	632	574	483	333	363	427	642	586	5487
Deaf Week #2	212	203	185	194	219	328	469	274	429	480	452	268	452	4165
Sign Language WK #1	91	95	95	260	94	100	154	93	153	89	103	137	298	1762
Sign Language WK #2	88	97	93	90	219	60	----	240	155	186	235	215	377	2055
Deaf Workers Seminar	----	----	----	83	45	53	100	50	----	----	----	----	----	331
Sword Week	214	236	226	265	266	377	275	----	----	----	----	----	----	1859
Sword Family Week	244	249	337	325	329	----	433	623	442	538	532	----	----	4052
Youth Week #1	282	545	521	449	584	477	491	296	223	800	855	571	671	6765
Youth Week #2	254	584	631	378	773	583	753	779	721	889	920	551	871	8687
Youth Week #3	----	----	----	743	528	574	798	664	754	654	749	667	857	6988
Youth Week #4	----	----	----	----	----	----	634	748	876	693	788	880	933	5552
Youth Week #5	----	----	----	----	----	----	----	614	754	686	683	774	1157	4668
Youth Week #6	----	----	----	----	----	----	----	----	----	----	----	197	----	197
Preachers Week	300	206	207	184	134	----	----	----	----	----	----	----	----	1031
Founders Week	----	----	----	----	----	----	----	----	550	----	431	436	640	2057
Special Week	58	46	----	----	----	----	----	----	----	----	----	----	----	104
Youth Retreat	----	----	----	----	----	----	----	60	60	----	----	----	686	806
Deaf Retreat	----	----	----	----	----	----	----	----	----	----	----	----	238	238
Ladies Retreat	----	----	----	----	----	----	----	----	----	----	----	----	242	242
Family/Evan. Sem.	----	----	----	----	----	----	----	----	----	----	----	----	368	368
Totals	2173	2708	2714	3490	3752	3944	5498	5873	6470	6414	7467	6513	9786	66802

Notes:

Senator CRANSTON. Thank you very much.

Who is going next?

Mr. OULUND. Mr. Chairman and distinguished members of the subcommittee, my name is Edward Oulund. I am the executive director of Christian Camping International, with our International office located near Somonauk, Ill. We are an association of church-related camps and conferences with over 90 percent of them located in the United States.

I am grateful to you, Mr. Chairman, for your invitation to speak on youth camp safety so that you and your committee could hear the views of a very large segment of the camping industry. Christian Camping International has over 4,400 camp and personal members in the United States that are represented by more than 50 different church denominations. Our member camps minister to between 3 and 4 million campers per year. Most of these campers are young people.

Is it necessary to have another bureau in Washington regulate and control the youth camping industry? We think not. We have polled our member camps to determine their attitude toward the youth safety bill which is being considered at this time. The response has come from 40 States from men and women executive directors who are professional camping people and have studied the bills. We received responses from over one-half of our directors, most of them from camps which have 75 to 80 percent of our campers. The poll indicated that 98 percent were opposed to the youth camp safety bill at this time, with only 2 percent being in favor of the bill as it has been published.

The youth safety bill has been introduced in Congress almost annually since 1966 when Senator Ribicoff first initiated the bill. The same unsupported opinions are given by protagonists of this bill, that camps are unsafe, where 200 to 300 campers annually drown or are fatally injured, and that only 6 or 7 States have adequate regulations to guard the safety of campers in our country. I believe that current data from the HEW Youth Camp Report, from reports of our larger camping associations, and Camper Insurance Companies do not support these opinions.

There has been a decided and growing improvement in the safety records of our camps in recent years. Although there were over 8,000 drownings in the United States last year, reported by the National Safety Council, only a very small percentage of them happened in a camp setting where the greatest exposure in time is evident.

Mr. Armand B. Ball, executive director of American Camping Association, in March 1977, edition of the Camping Magazine stated that, "In revewing the eight camper deaths and four staff deaths I have been able to document from the summer of 1976, it is significant that six of the eight campers and one of the four staff deaths occurred in conjunction with the aquatic area of camp."

This report shows the small number of campers or staff whose lives have been lost in proportion to the very large numbers of campers in the United States last summer.

I will not give John Anderson's testimony.

I have given you that many times. I would like to underscore the other paragraph concerning camp directors.

Camp directors are continually aware of the increasing cost of camper insurance. Statistics from two major insurance companies which cover camper insurance accidents of our CCI member camps show a comparative decrease in number of accident claims each year. These insurance companies covered nearly 12,000,000 camper days during 1977. From the records of the Heritage Insurance Company of San Antonio, Tex., the number of accident claims have decreased steadily from one in 640 camper days in 1967 to one in 871 camper days in 1976. In other words, there has been an improvement in the compers needing a doctor's care by 27 percent in 10 years. It should also be noted that most of these doctors' visits would never be given a second thought at home.

I will not go into all of the details of the church program but I would like to make a summary statement that the overwhelming number of camps in the Christian Camping International, I do not think, one and a half manpower is enough to cover this kind of technical data.

I would also encourage the committee to have an advisory committee and that on this committee we have representation by Christian Campers International.

The impending Federal regulations through the possible enactment of the youth camp safety bill has given an escalating number of States the impetus they need to adequately regulate the health and safety of campers in their States.

Mr. John Howe, president of the American Camping Association, at a Texas Camping Conference on March 7, 1978, stated that, "There are now 32 States that have some form of the youth camp safety regulations in their States."

At the same conference Dr. Frank S. Lisella, chief of the program development of HEW in Atlanta, stated that Kansas, Oklahoma, Nebraska, Florida, Washington, and Pennsylvania were all in the process of developing new camping regulations.

He also stated that in 1977 there were between 14 and 16 camping deaths.

Another opposition to this bill is its cost of administration and too often the subjective control by inspectors. We see this as another OSHA or food stamp program which can get out of control and may also be indifferent to the church camping industry. We see a similarity to Treasury Secretary William E. Simon's congressional testimony on August 12, 1975, on the food stamp bill when he said, "We begin with the best of intentions, but wind up with social programs that are spinning out of control." The food stamp program has skyrocketed to over $4 billion a year. As responsible taxpayers and in keeping with President Jimmy Carter's campaign promise to reduce Federal bureaus and spending, we recommend that the administration of the youth camp safety program be at the State level. We further believe the Federal Government should not usurp the jurisdiction of health and education which has always been a State responsibility.

Senator CRANSTON. Thank you very much.

[The prepared statement of Mr. Oulund follows:]

TESTIMONY

by

Edward Oulund

Executive Director, Christian Camping International

Sonnonauk, Illinois

Before the

Subcommittee on Child and Human Resources Development

of the

UNITED STATES SENATE

RE: Youth Camp Safety Legislation (S 422)

March 21, 1978

Mr. Chairman and Distinguished Members of the Subcommittee:

My name is Edward Oulund. I am the Executive Director of Christian Camping International, with our International office located near Somonauk, Illinois. We are an association of church-related camps and conferences with over ninety percent of them located in the United States.

I am grateful to you, Mr. Chairman, for your invitation to speak on Youth Camp Safety so that you and your committee could hear the views of a very large segment of the camping industry. Christian Camping International has over 4400 camp and personal members in the United States that are represented by more than 50 different church denominations. Our member camps minister to between three and four million campers per year. Most of these campers are young people.

Is it necessary to have another Bureau in Washington to regulate and control the youth camping industry? We think not! We have polled our member camps to determine their attitude toward the Youth Safety Bill which is being considered at this time. The response has come from 40 states from men and women Executive Directors who are professional camping people and have studied the Bills. We received responses from over one half of our directors, most of them from camps which have 75-80% of our campers. The poll indicated that 98% were opposed to the Youth Camp Safety Bill at this time, with only 2% being in favor of the Bill as it has been published.

The Youth Safety Bill has been introduced in Congress almost annually since 1966 when Senator Ribicoff first initiated the Bill. The same unsupported opinions are given by protagonists of this Bill, that camps are unsafe, where 200-300 campers annually drown or are fatally injured, and that only 6 or 7 states have adequate regulations to guard the safety of campers in our country. I believe that current data from the H.E.W. Youth Camp Report, from reports of our larger camping associations, and Camper Insurance Companies do not support these opinions.

There has been a decided and growing improvement in the safety records of our camps in recent years. Although there were over 8000 drownings in the United States last year, reported by the National Safety Council, only a very small percentage

of them happened in a camp setting where the greatest exposure in time is evident. Mr. Armand B. Ball, Executive Director of American Camping Association, in the March, 1977 edition of the Camping Magazine stated that, "In reviewing the eight camper deaths and four staff deaths I have been able to document from the summer of 1976, it is significant that six of the eight campers and one of the four staff deaths occurred in conjunction with the aquatic area of camp". This report shows the small number of campers or staff whose lives have been lost in proportion to the very large number of campers in the U. S. last summer.

Congressman John B. Anderson, in his March 30, 1977 testimony to the House committee, cited some significant statistics from the H.E.W. camp survey to show that a comparison of accidents and deaths to be 50 times less in camps than in the overall youth populace in our country. One significant fact that is constantly overlooked is that it is at camp where millions, if not most, young people learn water safety and how to swim. Camps are a major part of the solution to the drownings which occur each year in our country.

amp directors are continually aware of the increasing cost of camper insurance. Statistics from two major insurance companies which cover camper insurance accidents of our CCI member camps show a comparative decrease in number of accident claims each year. These insurance companies covered nearly 12,000,000 camper days during 1977. From the records of the Heritage Insurance Company of San Antonio, Texas, the number of accident claims has decreased steadily from one in 640 camper days in 1967 to one in 871 camper days in 1976. In other words, there has been an improvement in the campers needing a doctor's care by 27% in ten years. It should also be noted that most of these doctor's visits would never be given a second thought at home. They are made in camps to protect the camper from any slight medical problem; anything from a tiny scratch to a small blister. Then too, camp operators are aware of a growing national litigation syndrome for themselves and the medical profession which serve their camps. The cost of insurance to protect the camper and camp operator has more than doubled in the past ten years.

The impending Federal regulations through the possible enactment of the Youth Camp Safety Bill has given an escalating number of states the impetus they needed to adequately regulate the health and safety of campers in their states. Mr. John Howe, president of the American Camping Association, at a Texas Camping Conference on March 7, 1978, stated that, "There are now 32 states that have some form of the Youth Camp Safety regulations in their states". Our own survey and contacts with the 50 states Board of Health and Welfare departments show that the number considering camping regulations is growing.

At the same conference Dr. Frank S. Lisella, chief of the Program Development of H.E.W. in Atlanta, stated that Kansas, Oklahoma, Nebraska, Florida, Washington and Pennsylvania were all in the process of developing new camping regulations. He also stated that in 1977 there were between 14-16 camping deaths. This is certainly a very small percentage of summer youth deaths on a national basis.

When all varieties of camping come under one general classification, including Day Camping, we feel there is a growing encroachment of religious freedom in Christian camping which is an extension of the church-oriented leadership training and Christian Education. Day Camping, as it relates to churches, is no more than the original "Daily Vacation Bible School" program using the outdoor environment in an increasing way. Our member camps have a growing fear of Federal control and therefore, oppose the Bill most vociferously on this count. The United States Supreme Court has long held that the freedom and exercise of religious beliefs to be absolute and have continuously ruled against such regulations.

Although the Bill contains a non-interference provision, it is when these regulations are written (with little or no input from Christian Camping) that we become concerned. A couple of examples in the new NEW Suggested State Youth Camp Safety and Health Regulations, identifies one of the educational opportunities of camping as contributing toward the campers' "spiritual growth". Is this not a step toward control of an area relegated most specifically to the church? Since most of our member camps and conferences are an arm of the Christian Education of its denomination, such regulations as counselor to camper ratio reflect a new in-

trusion on the part of government as to how many campers should be taught by a counselor. Most Congressmen would not think of legislating how many pupils a Sunday Schoolteachershould be allowed to teach. The federal government has not yet tried to impose a restriction on the teacher-pupil ratio in the schools of America, so why begin with the camping industry?

Another opposition to this Bill is its cost of administration and too often the subjective control by inspectors. We see this as another O.S.H.A. or Food Stamp program which can get out of control and may also be indifferent to the church camping industry. We see a similarity to Treasury Secretary William E. Simon's Congressional testimony on August 12, 1975 on the Food Stamp Bill when he said, "We begin with the best of intentions, but wind up with social programs that are spinning out of control". The Food Stamp program has skyrocketed to over four billion dollars a year. As responsible taxpayers and in keeping with President Jimmy Carter's campaign promise to reduce federal bureaus and spending, we recommend that the administration of the Youth Camp Safety program be at the State level. We further believe the federal government should not usurp the jurisdiction of Health and Education which has always been a State responsibility.

Mr. Chairman and members of this Committee, I would like you to consider another option to your Bill. Consider helping Camping Associations with federal grants to become responsible agents for camp safety through a concentrated certification program. This could be approved by the various states as recommended by HEW but which would not reflect religious educational restrictions. The American Camping Association has already taken a leading part in this type of self improvement and most of the camping Associations such as the Boy Scouts and Girl Scouts have also formulated camp safety regulations to fit their programs. I believe that the Camping Associations in the United States would be better able to accomplish and control HEW camp safety goals at a fraction of the cost than through a federally administered program.

At considerable expense our Christian Camping Association has developed a new program of camp certification for our member camps and conferences known as Foundations for Excellence. In this program we are using camping consultants to help a camp/conference evaluate its entire program. The heart and first step of the program includes an appraisal of the camp safety and facilities, using the H.E.W. suggested Youth Camp Safety and Health regulations and an O.S.H.A. inspection check list brochure which has been developed for camps. Through subsequent consultant visits, evaluations and upgrading,a camp will become a certified camp.

In summary, I believe that: (1) the overwhelming number of camps in the Christian camping industry are already a safe place for our youth of America. There is no need of a new Federal agency to administer this program. (2) Federal regulations will be an encroachment of Christian Camping which is a unique arm of church-oriented leadership training and Christian Education. (3) Any camp safety program should be state regulated to allow for significant varieties of climate, terrain, population, religious, and ideological differences.

Senator CRANSTON. Mr. Wyrtzen?

Mr. WYRTZEN. My name is Jack Wyrtzen.

I am the director and founder of the Word of Life Camps at Schroon Lake, N.Y. Schroon Lake is located just south of Lake Placid, the site of the 1980 Winter Olympics.

We are organized as a nonprofit religious organization under the laws of the State of New York.

Thirty-two years ago we purchased a 90-acre island in the middle of Schroon Lake with 10 buildings from the Clark ONT spool thread people for $25,000. Today we have five camps all located on the same lake with over 300 buildings. We have a 135-acre ranch for boys and girls ages 6 to 11. A 135-acre ranger camp for junior highers ages 12 to 14. These two camps are also used for snow camp in the Winter and a year round Bible Institute. The 90-acre island is for high school, college and career young people ages 14 to 30. We have a 40-acre inn for adults and family groups. We have an 80-acre trailer park for family groups. Altogether we can accommodate 2,250 campers per week plus a staff of about 600.

We started a small camp operation in 1948. Today we have all year camping in the Adirondacks, and youth camps on all six continents of the world.

As a Boy Scout, I remember the fun of going on all night hikes and sleeping in a pup tent. We used to write home of how many of us were able to pack into a tent. This was part of the fun of the overnight. Now, the law demands 40 square feet per camper.

As a child, I used to go a church camp on a farm with a small stream for swimming and all of us fellows slept in a hayloft. Those days, because of bureaucracy, are gone forever.

When we first started our camps, the county board of health sent the local doctor to inspect us. Then came the New York State Board of Health. Then the New York State Environmental Conservation Department and in 1973 the Adirondack Park Agency.

There is no smoking, no drugs, no rock music, and no drinking allowed at our camps. Each camper is required to attend 3 hours of Bible study a day to get to know the book our country was founded on. We have been able to reach thousands of hippies, dope addicts, alcoholics, homosexuals, and those caught up in the sex revolution as well as many spoiled kids from some of the best homes in the land. We also have had large numbers of cadets from West Point and the Air Force Academy, midshipmen from Annapolis, high ranking officers from the Pentagon plus many business and professional people.

Our entire program is geared to produce God-fearing young people who are profitable to our society, and I believe we are living proof that our program works.

Last year campers came from 39 States and 31 foreign countries. We are helping thousands of kids of all races and creeds.

When we started 32 years ago we had few regulations. Today we have many regulations. New regulations have come out forcing us to cut the number of campers which often includes inner-city kids who we try to bring in free of charge as our guests. Instead of en-

joying a week or two in the mountains, they are left to shift for themselves in the ghettos. We would like to spend our time helping people.

I believe your intentions are good but the end results will curtail camping.

All of the camp directors that I know are very concerned about safety or they would not be in camping. Let me illustrate how well we at Word of Life keep the camping laws of New York State. The State law says that we need one counselor to every eight campers ages 8 to 16. Word of Life provides one counselor to every five campers ages 6 to 30.

We do not feel that we need a Youth Camp Safety Act with more redtape from Washington on top of that which we already have. I come from a State that has strict camping laws and our rapport with the New York Health Department is excellent. We believe Congress could better spend its time on items that face the Nation as a whole, such as the liquor industry that is responsible for one murder on the highways of America every 20 minutes.

There are about 15,000 camps in America and thousands of campers attend each year. Mr. C. Grant Spaeth, a legislative specialist in the Department of Health, Education, and Welfare, stated last year, "Youngsters are far safer in camps than in their own communities."

If this new bill, S. 258, is enacted, it would start one more Federal bureaucracy which could result in fielding hoards of Federal inspectors to harass and intimidate camp operators and result in a transfer of another local function to centralized government.

This legislation contains the potential to destroy religious camps. Havoc could be caused, for example, by an atheist being sent to inspect a camp that teaches faith and trust in a holy God.

As I understand this proposed law, it would:

a. Develop and police standards;

b. Enter and inspect camps;

c. Subpoena and interrogate camp operators, employees, and/or guests;

d. Issue citations and determine penalties—fines up to $1,000 a day or close down camp until Federal regulations are met; and

e. Require that a detailed itinerary would be filed with the Federal Government in duplicate every time we took kids on a hike and it would increase our paperwork immensely. We already are subject to an astounding array of State and Federal laws having to do with food, milk, water purity, sanitation, and safety.

In closing, we believe proper health and safety standards are important but the place to establish and oversee those is at a State level in concert with local governments and camping organizations as is now the case in most States.

The enactment of S. 258 would result in the costly transfer of another State and local function to centralized government.

I would urge that this new Youth Camp Safety Act be dropped.

Thank you.

Senator CRANSTON. Thank you very much.

Mr. Wyrtzen, I would like to ask you this: You operate a camp in the State of New York, which is one of the 13 States generally regarded as having adequate youth camp health and safety laws.

Senator CRANSTON. Mr. Wyrtzen, I would like to ask you this: You operate a camp in the State of New York, which is one of the 13 States generally regarded as having adequate youth camp health and safety laws.

Do you feel those laws interfere with your ability to operate your camp or hire personnel consistent with your religious convictions?

Mr. WYRTZEN. Right now; no, sir.

Senator CRANSTON. Do you find it expensive to conform with New York State requirements?

Mr. WYRTZEN. No, sir.

Senator CRANSTON. Well, what type of information with respect to safety then do you give to parents of your campers?

Mr. WYRTZEN. We issue camp folders every year and we have grown from the few hundred to the thousands and we have camps for all ages and oftentimes parents will stay at one camp and bring their children to another camp.

The people, the growth that we have had, not only in the United States, but in all six continents, our record speaks for itself.

Senator CRANSTON. If you would each send in a camp folder, we would appreciate it.

Mr. WYRTZEN. Yes; I already gave one.

Senator CRANSTON. Mr. Oulund, Illinois is also a State regarding as having adequate youth camp health and safety laws.

I understand that members of your organization also operate camps in some of the other States with adequate laws.

Can you comment on the experiences of camp operators in States with adequate laws as contrasted with operators in States without similar legislation?

Mr. OULUND. Well, I think most of our camping people have been involved with one or another camping association.

In response to this is the fact that this youth camp safety bill has been an issue for a number of years. Many of the camping associations have taken the initiative by having workshops and seminars, and in all of our conventions having some very special emphasis in camp safety.

So, our camps seem to be growing in safety awareness and practice primarily because of their involvement with our camping associations and not necessarily because of the legislation which vary in each state.

Senator CRANSTON. Do the camp operators in Illinois and other States with meaningful State laws find that they interfere with the religious basis of the camps in your association?

Mr. OULUND. Not at this time, no.

Senator CRANSTON. You have recommended that administration of youth camp safety standards be at the State level, as I have indicated earlier, one approach which has been considered in the past is for the Federal Government to provide increased technical assistance and financial assistance, on a matching basis, to help those States which

want assistance and upgrading of their laws, or need additional resources to monitor enforcement of their State standards.

Do you feel there is a need for that type of legislation?

Mr. OULUND. Yes; very definitely.

Senator CRANSTON. Mr. Oulund, you have cited in your written testimony, statistics with respect to the number of claims filed with the Heritage Insurance Co.

How many dollars of camp insurance did Heritage provide in 1967, as compared to 1976?

Can you furnish that for the record?

Mr. OULUND. I can.

[At the time of publication of the hearing record, the material had not yet been submitted.]

Senator CRANSTON. Thank you very much.

Mr. Camp, I will ask you, since that did not take as long as I thought it might: What type of State or local regulation is your camp now subject to?

Mr. CAMP. We are required to have a State license permit.

Also, in our pool, we should have a pool permit.

We are also required to have a sanitation permit by the State.

I do have regulations here that were adopted in 1966 by the State of Tennessee, revised in 1970. We will have once a week inspections by these personnel and then we also must maintain daily records of our sanitation plans, and our pool.

Senator CRANSTON. Are there areas where you feel that regulation in Tennessee is either inadequate or inappropriate?

Mr. CAMP. No, sir.

Senator CRANSTON. Thank you very much.

That concludes my questions.

That concludes this hearing.

We will, as I repeat, send to each of the witnesses a copy of the administration bill when we get it. And we invite your comments on it.

Thank you very much. We stand adjourned.

[Whereupon, at 12:23 p.m., the subcommittee was adjourned.]